

# MODERN SLAVERY POLICY

## Organisation

This statement applies to the company the information included in the statement refers to the requirements of the Modern slavery act 2015

## Organisational Structure

We are a Small/Med sized enterprise working in the construction industry. We are a limited company and have a registered head office. The company employs its own personnel and uses sub contract specialist contractors with in the UK and Ireland. Our working area is mostly in Scotland

## Definitions

The company considers that modern slavery encompasses:

Human trafficking;

Forced work, through mental or physical threat;

Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;

Being dehumanised, treated as a commodity or being bought or sold as property;

Being physically constrained or to have restriction placed on freedom of movement.

## Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The company strictly adheres to the minimum standards required in relation to its responsibilities under the relevant employment legislation.

## Supply Chains

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

## Modern Slavery Policy (continued)

### Potential Exposure

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### Due diligence processes for slavery and human trafficking

The company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, the company has taken the following steps to ensure that modern slavery is not taking place:

We limit the geographical scope of our operations to the UK, Ireland and Europe

- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behavior
- With regards to national or international supply chains, our point of contact is preferably with a UK or Ireland company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers

### Measures

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

Right to work checks completed at recruitment stage;

Ensure minimum employment age adhered to, in line with the relevant legislation.

Always apply national minimum wage thresholds, in line with the relevant legislation;

Regular contact with material suppliers including their understanding of, and compliance with, our expectations.

### Slavery Compliance Officer

The Company appoints the managing director as the compliance officer to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Company obligations in this regard. This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each year.

Des Keegan  
Operations Director

Signed: 

Dated: 21/06/2018