



Modern Day Slavery Act Policy	
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## **Modern Day Slavery Act Policy**

The Coffey Group recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Coffey Group is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them this policy applies to all those employed by the Coffey Group.

The Coffey Group activities are varied through multiple disciplined areas and sectors such as: Building, Civil, Water & Wastewater, Mechanical & Electrical, Environmental and Specialist Engineering Construction Services including Design & Build, Design Build & Operate and Facilities Management. Consequently, we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Business Ethics Policy Statement (CPY-GN-005) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement. This policy is understood and communicated to all levels of the company through our Human Resources Information System, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Coffey Group activities.

### **Our Supply Chain**

The complexity of our supply chain in the UK make it challenging to manage business and sustainability issues. Whilst respecting human rights in the supply chain is ultimately our suppliers' responsibility, as the customer, we expect those in our supply chain to respect our values and to adopt suitable anti-slavery and human trafficking policies and practices. In 2018 approximately 96% of our supply chain were UK based. The other 4% of our supply chain are based in the Republic of Ireland and inside the EEA.

To ensure that suppliers are similarly committed, our policy includes the following: -

- Businesses invited to supply goods and services to Coffey Construction Limited are required to complete the Supplier and Subcontractor Questionnaire to demonstrate how they are addressing their obligations under the Modern Slavery Act. If they do not have their own Modern Day Slavery Act Policy they have been asked to sign statements supporting the aims of the Act and will be asked to reconfirm their commitment annually. The response is evaluated as part of the procurement process.
- Coffey Construction Limited is entitled to terminate contracts where an offence has been committed under the Modern Slavery Act.

### **Policy Aims**

The Coffey Group will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to): -

- All our employees and subcontractors/supplier's employees must fill out a Fitness to work/Right to Work check at Induction;
- Contracts of employment, and pay, are directly with the individual – we pay a minimum of the living wage.



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- Our Whistle blowing policy encourages the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff. All Directors have been briefed on the subject. We use the following key performance indicators (KPIs) to measure 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:

- Use of labour monitoring and payroll systems;
- Risk Assessment and Audit of our Supply Chain annually to be redone in Q2 2019.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement. The Coffey Group will publish the Modern-Day Slavery Act Policy Statement on our website for the public, employee's, customers, clients, NGOs or investors to view.

Signed: 

Odran Madden

Managing Director

Date: 20/02/2019