

# Modern Slavery and Human Trafficking Policy Statement

This Statement is made Pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps Kiely Bros has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain.

Modern slavery and human trafficking remains a hidden blight on our global society. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages. Kiely Bros Code of Conduct prohibits modern slavery.

Kiely Bros will comply with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights.

All Kiely Bros employees have a responsibility to comply with the Code of Conduct and be alert to the

risks brought about by modern slavery in our business and the wider supply chain. Staff are expected to report any concerns and management are expected to act upon them.

Suppliers (including their own subsidiaries or sub-contractors) are expected to act in accordance with the Kiely Bros Supplier Code of Conduct, or an equivalent of its relevant core principles, in the performance of any agreement.

One of Kiely Bros values is Act Ethically and Transparently. Kiely Bros has a zero tolerance to slavery and human trafficking, and we expect all of our suppliers and sub-contractors to comply with and meet our values and standards. Kiely Bros will ensure compliance through management meetings, site visits, internal and external audits.

## Policy Application

Kiely Bros has put in place fair and transparent recruitment and resourcing procedures in relation to labour practices, false employment and modern slavery in accordance with relevant legislation and standards.

The requirements made of the supply chain in regard to modern slavery are communicated and contracted upon through our Supplier Code of Conduct and Sustainable Procurement Policy. Kiely Bros expects all suppliers to conduct right-to-work checks of their workforce in accordance with the Immigration, Asylum and Nationality Act 2006, which will be reinforced when a worker attends their first site induction where their papers will be verified.

Kiely Bros will seek to work in partnership with all suppliers to tackle and combat the threat of human trafficking and modern-day slavery across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethical standards.

In order to ensure the highest level of understanding of the risks associated with Modern Slavery and Human Trafficking in our supply chain, Kiely Bros provides training for all staff members, and this training will be continued during 2018/2019.

Kiely Bros use key performance indicators (KPIs) to measure effectiveness in ensuring that slavery and human trafficking is not taking place in any part of the business or supply chain.