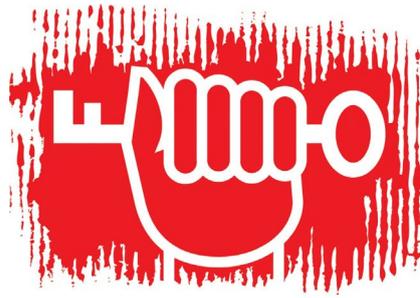


# ANTI-SLAVERY / HUMAN TRAFFICKING

## POLICY STATEMENT



# anti-slavery

**Policy Statement:** Rev 4

**Issue Date:** 10/01/2021

Signed:

Eamonn Laverty  
Chief Executive Officer

### **Purpose**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-slavery and human trafficking legislation. It is designed to assist McAleer & Rushe comply with the Modern Slavery Act 2015 and to ensure that the Company's business is conducted in a socially responsible manner.

### **Policy statement**

McAleer & Rushe is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy 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.

The policy gives workers, contractors and other business partners guidance on slavery and human trafficking and the measures taken by the organisation to tackle slavery and human trafficking in the business and its supply chains.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to human trafficking. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter human trafficking.

We will uphold all laws relevant to countering modern slavery in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Modern Slavery Act 2015 in respect of our conduct both at home and abroad.

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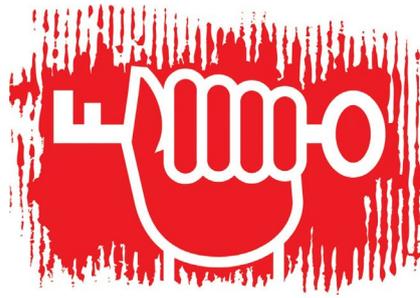
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Modern slavery is punishable for individuals by imprisonment and a fine. If we are found to have taken part, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### Scope

This policy covers any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, agency staff or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

### Due Diligence Processes for Slavery and Human Trafficking

As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.

As part of our initiative to identify and mitigate risk -

We limit the geographical scope of our sites to ensure optimum supervision of the use of our properties.

Where possible we build long standing relationships with local suppliers and clients and make clear our expectations of business behaviour;

With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain.

We have in place systems to encourage the reporting of concerns

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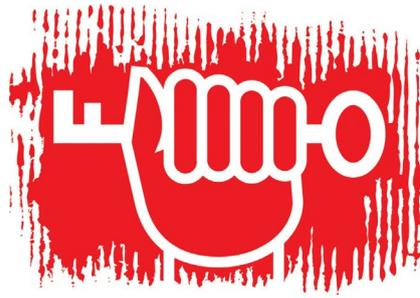
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### **Your responsibilities**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or the Managing Director as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Managing Director.

### **How to raise a concern**

It is important that you tell a company director or senior manager as soon as possible if you have any concerns regarding the supply chain or suspect that this may happen in the future, or believe that someone is victim of another form of unlawful activity.

### **Training and communication**

During the induction process all employees will be informed on this policy. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

Our zero-tolerance approach on slavery and human trafficking must be communicated to all suppliers, contractors and business associates when the business relationship commences.

### **Who is responsible for the policy?**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Company Directors and senior management has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

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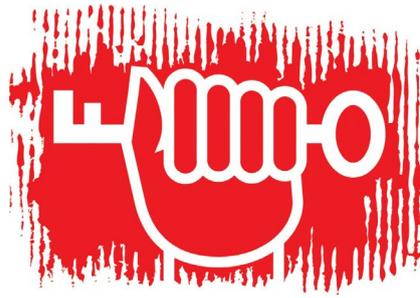
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Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

### **Monitoring and review**

The Company directors and senior management will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering modern slavery and human trafficking.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Directors.

### **Breaches**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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