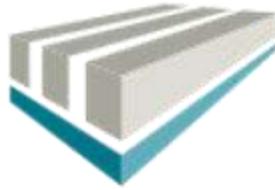


**BANAGHER**  
PRECAST CONCRETE

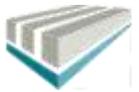


# Modern Slavery Policy



2019-2020

**PRECAST  
CONCRETE  
SPECIALISTS**



## Modern Slavery Policy (Anti-Slavery & Human Trafficking) Statement

Modern slavery is a crime and a 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.

Banagher Precast Concrete has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chain.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our sub-contractors, suppliers and other business partners.

This policy applies to our supply chain and to all persons working for us or on our behalf in any capacity, including employees at all levels, agency workers and apprentices.

This statement and policy sets out the steps taken by Banagher Precast Concrete to prevent slavery and human trafficking in our business and supply chain. This statement is made pursuant to the UK Modern Slavery Act 2015

## Anti-Slavery & Human Trafficking Policy

Our Anti-Slavery & Human Trafficking 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 chain.

As part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our initiative to identify and mitigate risk:

- New sub-contractors and suppliers identified as being potentially high risk must provide references and undergo a pre-qualifying questionnaire to ensure humanitarian standards are met. Contracts that we negotiate with high-risk suppliers contain anti-slavery provisions which prohibit suppliers and their employees from engaging in modern slavery
- We monitor the Global Slavery Index to risk assess new vendors based on their geographical location <https://www.globalslaveryindex.org/2018/data/maps/#prevalence>

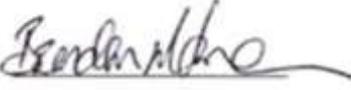
- Ensure that our Modern Slavery (Anti-Slavery & Human Trafficking) Policy is made available to all our suppliers and business partners to ensure alignment with our values and zero-tolerance policy (website & vendor contracts)
- We ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work, and that they are legally able to work in the country in which they are recruited
- We conduct due diligence checks on any recruitment agency that we use to ensure that it is reputable and conducts appropriate checks on all staff that they supply to us
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or our supply chain. All notifications received, together with the identity of the notifier, will be treated as confidential
- The Company Directors have overall responsibility for ensuring this policy with senior management; and managers have day to day responsibility to ensure compliance with our legal and ethical obligation

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct.

We may terminate our relationship with suppliers and other third parties if they breach this policy.

To date we have not been made aware of any human trafficking / slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company slavery and human trafficking statement for the financial year ending 31 December 2019.



**Brendan Mahon**  
Managing Director