

<b>Title:</b>	Anti-Slavery Policy
<b>Description:</b>	Arrangement to Prevent Modern Anti-Slavery Practice in the Group
<b>Publish Date:</b>	20 <sup>th</sup> May 2020
<b>Next Review Date:</b>	1st May 2021
<b>Prepared by:</b>	Group SHEQ Manager
<b>Audience:</b>	All Staff

## Anti- Slavery Policy

Conneely Drylining Ltd/ Facades Ltd takes 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 effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

### Compliance with the policy

All our employees must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those that either work for Conneely Drylining Ltd/group or are under our control to ensure the prevention, detection and reporting of any possible breaches of this policy. All our employees are encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage. Conneely Drylining Ltd encourages openness and transparency and any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our employees are encouraged to act without any fear of reprisal. If an employee believes or suspects that there has been a breach of this policy, or a breach may occur in the future, they must notify their line manager and the head office where a Director will respond the same day. Conneely Drylining Ltd will do everything it can to protect the confidentiality if this has been requested by an employee. However, employees are discouraged from making any disclosures anonymously, as this can limit the investigation process. Following an internal investigation, the group/ Conneely Drylining Ltd may decide to alert the police.

### Safeguards

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If an employee considers that they have suffered any such treatment, then they should inform their line manager immediately or contact head office immediately where a Director will respond the same day.

## Communication and awareness of this policy

Conneely Drylining Ltd/ Facades Ltd recognizes its statutory obligations in connection with the Modern Slavery Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains. However we recognize that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonably able, to prevent modern slavery from occurring

- We will provide training on this policy to all our employees focusing on the risk the Group/Conneely Drylining Ltd.'s business faces from modern slavery in its supply chains.
- We will communicate Group wide/Conneely Drylining Ltd 's zero-tolerance approach to modern slavery and this Policy to all sub-contractors, consultants, joint venture partners and any other agents, third- party representatives and business partners at the outset of our business relationship with them and as appropriate thereafter.
- We will introduce contractual provisions for all our suppliers to confirm their adherence to this Policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We will review this Policy annually and update it where necessary.

The following will be implemented during the financial year of 2019/2021

- The supply chain to impose the same standards on their own supply chain by including it in our preferred supply chain contracts and any new appointments
- Ensure a risk assessment, has been undertaken either by internal auditors or others within the organisation, to assess the relevance of the legislation and areas in the group where there is highest risk of non-compliance, internal audit cannot cover everything so we will need to focus compliance within areas of highest risk
- Raise awareness of the legislation to key stakeholders e.g. Board and Audit Committee, perhaps by sharing the Independent Anti-Slavery Commissioner's report with the group.

Signed By



**Managing Director: John Cockerton**

**Date 24.05.20**