

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY



Organisation

This statement applies to Galloway Construction Ltd (referred to in this statement as 'the Organisation').

Organisational structure

The organisation operates from one centralised office in Carrington from which location all employees and workers are allocated work on various sites within the UK. These sites belong to or are controlled by our clients. Our work is classed as that of a specialist sub-contractor.

The organisation is privately owned and is not part of a larger group. The senior management level consists of the Managing Director supported by a team of specialist Managers.

Demand for our product is consistently high throughout the year and is therefore not seasonal.

The labour supplied to the Organisation in pursuance of its operation is carried out at various sites as mentioned above mainly within the United Kingdom

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum

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standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the Construction sector of the UK. We understand that the Organisation's first-tier suppliers are comprised of manufacturers and intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

The organisation has no collective agreements with UK Trade Unions.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in the labour market within the UK.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers, and the requirement to complete a supply chain questionnaire

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

1. The regular checking of all relevant documentation checks for all employees and workers
2. Regular consultation with all employees and workers

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3. The provision of private in-confidence meetings with any worker where their circumstances have changed or where the organisation has reason to suspect a change in an individual's circumstances
4. The regular gathering of information and assurances from our suppliers in relation to the measures they have taken to prevent Modern Slavery exposure

The above includes steps relating to:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in our supply chains
- undertaking impact assessments of our services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- any actions taken to embed a zero-tolerance policy towards modern slavery
- any training provided to staff on modern slavery.

This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance, adequacy and effectiveness.



Ian Preston
Managing Director
Gallaway Construction Ltd
04/01/2023

