



## **MODERN SLAVERY STATEMENT**

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by McGoff and Byrne and other relevant group companies to prevent modern slavery and human trafficking in its business and supply chains.

### **Introduction**

Slavery and human trafficking are abuses of a person's freedoms and rights. They are however a growing issue across the world, in every region and every economy. We recognise that we have a responsibility to prevent modern slavery and human trafficking both within our business and our supply chain. We are committed to making a positive contribution to society by developing and implementing business practices that allow us to deliver financial success whilst conducting our business strategy and operations in a responsible manner.

### **Our business**

McGoff & Byrne Ltd is a UK based, privately owned, multi award winning construction and integrated support services business established in 1973. We work with a select list of repeat business branded clients both nationally and internationally within the Leisure, Retail and Healthcare sectors. Our holistic service offering includes site identification/acquisition, architectural design, construction, interior design and facilities management tailored to the specific requirements of our valued client base.

Our Integrated Management System is accredited by ISO 9001 Quality, ISO 14001 Environmental and OHSAS 18001 Health & Safety. We also hold CHAS, Constructionline, NHBC and Investors in People Gold accreditation.

### **Our policies**

We have adopted a code of conduct which sets out a number of principles with which we comply and that we expect our suppliers to comply with. These include statements that all employees shall be free to choose their employment and shall not be forced to work against their will, and that there shall be no forced, bonded or involuntary prison labour or human trafficking.

For our employees, failure to comply with the provisions of the Code may result in disciplinary action which could result in their immediate suspension or the termination of their employment.

We also operate a whistle blowing policy, aimed at our employees, which encourages staff to report any wrongdoing, including human rights violations such as modern slavery or human trafficking. Any reports of this nature will be fully investigated and appropriate remedial actions taken.

In relation to our suppliers, we believe that transparency is vital to a successful business relationship. We are committed to building long-term relationships with suppliers and value open and honest communication with them. In the event of non-compliance with our Code of conduct, we expect our suppliers to be committed and engaged in remedying the issue within a time-frame set out in a corrective action plan to be agreed with the supplier. We reserve the right to terminate any agreements should a supplier decide that compliance with the Code is impossible or where a supplier shows repeated disregard for the provisions of the Code.

We operate a zero tolerance for modern slavery and our respect for human rights, including children rights. We also encourage anyone (including employees, sub-consultants, sub-contractors and suppliers) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practice.

### **Our supply chain**

The McGoff and Byrne Group Supply Chain comprises of the engagement of over two hundred different suppliers to provide the supply of various materials and plant to our construction sites. Our suppliers vary enormously in terms of their size and expertise and many of those will themselves be reliant on their own supply chain, potentially across many countries, in order to be able to supply relevant goods or services to us.

Additionally, we have the service of over two hundred and forty subcontractors who provide our various labour requirements (and some materials) to our construction sites. These subcontractors will include, but not limited to, Groundworkers, Bricklayers, Scaffolding, Joiners, Plumbing & Electrical, Painting and Roofers.

We are continually striving to build and maintain longstanding relationships with all of our supply chain and make clear our expectations of all of our business partners. We are developing our KPI's to specifically focus on our supply chain and their approach to tackling modern day slavery and trafficking. We will also be looking to incorporate a provision into our standard terms and conditions.

### **Current and proposed due diligence processes for modern slavery and human trafficking**

We have started work on establishing a range of due diligence processes to enable us to identify and assess potential risk areas in our business and our supply chain.

By managing all of our sites we have optimum control of the work environment, including labour scheduling and pay rates, thus reducing the risks within our own business. Nevertheless, training will be developed and delivered to appropriate individuals across the business to ensure that they are aware of the issues and able to assess the risks in their area of responsibility.

We expect all major suppliers to have suitable anti-slavery and human trafficking policies and processes in place. Significant suppliers and those in businesses perceived to be most at risk have been asked to confirm their compliance with our code of conduct or to confirm that they have their own equivalent arrangements. This will be rolled out to our other smaller suppliers over time.

As set out above, we reserve the right to terminate any agreement should a supplier decide that compliance is impossible or where a supplier shows repeated disregard for our code's provisions.

We also propose to update our supplier terms and conditions to require compliance with the Modern Slavery Act and to permit periodic and targeted audits of suppliers in this regard using a risk-based approach.

**Our effectiveness in combating slavery and human trafficking**

We understand that the risks of modern slavery and human trafficking are growing, and we will continue our approach to mitigating this risk in the year ahead.

This statement was approved by the board of McGoff and Byrne.

A handwritten signature in blue ink, appearing to read 'DM', is positioned above the name Dave McGoff.

Dave McGoff  
April 2017