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Modern Slavery Policy

This statement is made pursuant to Section 54, part 6 of the Modern Slavery Act 2015 and sets out the steps Sharkey has taken to address the potential for slavery and human trafficking taking place in our business or supply chain.

POLICY STATEMENT

We recognise modern slavery, as set out in the Act, and seek to do our part to remove such practices in the construction industry. Sharkey shall never engage with an organisation that does not comply with the Modern Slavery Act. All Sharkey Employees are paid above the real living wage. We comply with local minimum age laws and do not employ child labour.

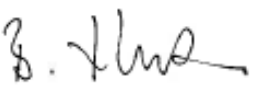
Where applicable, our employees comply with the working time directive and, where they have opted out because they direct their own work; they are encouraged to work no more than 48 hours per week and to take regular breaks. All our employees are paid by bank transfer and we do not allow payment to be made into third party bank accounts thus minimising the risk of forced or compulsory labour.

The nature of our business makes it unlikely we would employ mentally vulnerable adults but if this were the case we would arrange for them to have a dedicated carer and high level support from the HR team.

All employees are vetted for the right to work in the country where they are employed; where employees require a work permit/VISA we assist them to procure appropriate documentation.

As a responsible employer we take the welfare of our employees seriously and our Whistleblowing policy allows employees to report wrongdoing, including exploitation, in any form.

We make reference to our policy on Modern Slavery, Human Trafficking and Exploitation in our management system and this statement is available for all to read on SIMOn and is provided to clients or potential clients on request.



Billy Harrison
Managing Director
Signed on behalf of Company Shareholders
13 January 2025

George Sharkey & Sons Ltd T/A Sharkey, Company Registered Number: SC164725

Modern Slavery Policy

OUR COMMITMENT

Our reputation as an ethical company is one of our most valuable assets. Our Code of Conduct and Ethics clearly sets out our core principles of being a responsible and ethical business, and our commitment to operate with integrity, honesty, and fairness.

Sharkey reject any form of child labour or slavery, including forced labour. We promote a culture of awareness and transparency and encourage our employees to report any suspected wrongdoing.

PREVENTION

In our recruitment process, we conduct all the necessary checks as outlined in our Right to Work Policy, to ensure all Sharkey employees have right to work in the UK.

Our employees comply with the working time directive. They can opt out of the 48-hour working week, but this is voluntary, and all employees that choose to opt out are encouraged to work no more than 48 hours per week and to take regular breaks.

All Sharkey Employees are paid above the real living wage. We comply with local minimum age laws and do not employ child labour. All our employees are paid by bank transfer and we do not allow payment to be made into third party bank accounts thus minimising the risk of forced or compulsory labour.

SUPPLY CHAIN MANAGEMENT

We identify and address potential modern slavery situations. Although we are confident in our internal business practices, the construction supply chain can be complex, often with many tiers of suppliers between main contractor and the source of raw materials. We have adopted various means to clearly communicate our expectations around human rights and modern slavery to our suppliers.

These include:

- Prequalification processes. Any potential supply chain member who wishes to be an 'approved' partner undergoes a rigorous pre-qualification procedure. This procedure has been updated to include questions around the supplier's policies and procedures concerning human trafficking and modern slavery.
- Commercial agreements. We have updated our commercial agreements with our supply chain to highlight and require compliance with the Act.

REPORTING

Sharkey employ ethical business practices and we take the welfare of our employees seriously. We encourage Speak Up culture and urge everyone to speak up when they see possible violations of the Code of Conduct and Ethics, Sharkey policies, and legal and regulatory requirements. Our Whistleblowing Policy allows employees to report wrongdoing, including exploitation, in various forms without detriment to their employment.

Unannounced site audits help identify risks and detect gaps or practices that could lead to modern slavery being able to take place.

Modern Slavery Policy

TRAINING

Sharkey employees sign up to the Code of Conduct and Ethics, and they abide by the Company Handbook. We provide training on the legislation to Sharkey employees and selected parts of our supply chain.

FAILURE TO COMPLY

Failure to comply with the Act is a material breach of the terms of our standard subcontract.

REVIEW

Sharkey's Modern Slavery Policy will be reviewed annually, or as required due to change in legislation or best practice.