Human Trafficking & Modern Slavery Policy

2021

JJ Rhatigan
Building Contractors

INTRODUCTION

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the mechanisms that the JJ Rhatigan Co. (UK) Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. We are committed to acting ethically and with integrity and transparency in all business dealings and to ensure effective systems and controls are in place to safeguard against any form of modern slavery or human trafficking taking place.

Our supply chain includes companies who supply raw materials, specialist trade contractors that undertake supply and fix contracts, Labour-only subcontractors and specialist professional organisations that provide a range of services across the portfolio of projects we deliver for our clients. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will 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.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

RESPONSIBILTY FOR THIS POLICY

JJ Rhatigan Co. (UK) Ltd Top Management have overall responsibility for ensuring this policy is in compliance with our legal and ethical obligations, and that all those under our control comply with it.

The organisation will uphold its primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

COMPLIANCE WITH THIS POLICY

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for and or behalf of the organisation and will be expected to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. They must notify their direct managers or the Regional Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. All notifications will be treated with the strict confidentiality in accordance with our Whistleblowing Policy as soon as possible.

Where applicable and appropriate, with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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JJ Rhatigan & Company (UK) Ltd. VAT Reg No. GB 988836829 Company Reg No. 07096215

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 in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

COMMUNICAITON AND AWARENESS OF THIS POLICY

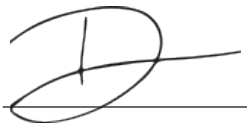
Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the organisation and applicable persons.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACH OF THIS POLICY

Any employee or contracted person working with or on behalf of the organisation who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

This statement has been approved by our Directors & Senior Management who will review and update it as required on an annual basis. This policy does not form part of any employee's contract of employment and we may amend it at any time.



Tom Neylon
Regional Director

26 January 2021

Date

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