

MODERN SLAVERY ACT POLICY

Version 9
1st September 2025

P. Flannery Plant Hire (Oval) Ltd is dedicated to enhancing our practices to combat modern slavery and human trafficking, recognising these issues as significant challenges in today's society. Operating within the construction and plant hire industries, we provide plant and equipment hire services while maintaining a supply chain composed of contractors, subcontractors, and both local and international suppliers. Our goal is to responsibly inform all employees and contractors about the potential risks—no matter how small—within our business and the broader supply chain. We encourage and expect all employees and contractors to report any concerns to management, who are committed to taking appropriate action.

We firmly commit to ensuring that modern slavery and human trafficking are absent from our supply chains and business operations. Our Anti-Slavery Policy Statement reflects our dedication to ethical conduct and integrity in all business relationships. This policy aligns with [Section 54 of the Modern Slavery Act 2015](#) and has been approved by the board of directors, applying to all employees of the company. It underscores our commitment to implementing effective systems and enforcing controls to prevent slavery and human trafficking across our supply chains.

Policies and Due Diligence Processes

P. Flannery Plant Hire (Oval) Ltd adopts a zero-tolerance approach to modern slavery and human trafficking. We have zero tolerance for slavery and human trafficking and expect all those in our supply chain, including contractors and subcontractors, to comply with our values. Our policies are structured to ensure that such practices do not occur within our business or supply chains.

The Company will achieve these aims by identifying and mitigating risks in the following ways (but not limited to):

1. More stringent vetting and investigation of our supply chain: This includes thorough assessments of contractors, subcontractors, policies, and contracts to ensure compliance with our ethical standards.
2. Continually checking that all workers are both paid at least the minimum wage and have the right to work: We regularly monitor our operations and supply chains to confirm compliance with wage laws and working conditions.
3. Encouraging the reporting of concerns and protecting whistleblowers: We foster an open and transparent environment where employees and contractors can safely report any concerns regarding potential violations, with guaranteed whistleblower protection.
4. Not knowingly supporting or dealing with any business involved in slavery or human trafficking: we refrain from engaging with businesses known to be involved in such practices, conducting regular checks to prevent such relationships.

Risk Management and Accountability

We acknowledge that certain aspects of our business and supply chains may pose higher risks for modern slavery and human trafficking, particularly when working with subcontractors or suppliers in regions with weak labour protections. To address these risks, we have established stringent vetting procedures and conduct regular audits of suppliers and contractors. Our processes are designed to continuously assess, monitor, and manage any potential risks. This policy is supported by disciplinary procedures for breaches, and Directors regularly review our supply chains to ensure ongoing compliance and relevance.

Measuring Effectiveness

To gauge the effectiveness of our Anti-Slavery Policy, we have developed key performance indicators (KPIs) to assess our success in preventing slavery and human trafficking within our operations and supply chains. These include:

- Audits conducted by Directors, Managers, Safety Managers, and Safety Advisors.
- Utilisation of labour monitoring and payroll systems to ensure compliance with wage laws and working conditions.
- Engagement and communication levels with suppliers to ensure they understand and adhere to our ethical standards.

Through these initiatives, we strive to enhance our capability to prevent and address risks of modern slavery and human trafficking.

Training and Awareness

To promote a high level of understanding regarding the risks associated with modern slavery and human trafficking, P. Flannery Plant Hire (Oval) Ltd provides regular training to relevant staff, especially those involved in procurement and supply chain management. Directors and senior management receive comprehensive briefings on this topic, and ongoing capacity-building efforts ensure all employees are equipped to identify and respond to any risks effectively.

Implementation and Review

Copies of the policy will be provided to all employees and the receipt acknowledgment by each person shall be maintained. Flannery's will communicate, implement, and maintain this policy at all times throughout the organisation.

This policy is effective from the 1st September 2025 and will be reviewed annually. Overall implementation of this policy lies with Patrick Flannery (Managing Director) and Compliance Manager. Any queries relating to this policy should be directed to the Compliance Manager in the first instance.



Patrick Flannery
Managing Director

1st September 2025

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