



Modern Day Slavery Act Policy	
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Modern Day Slavery Act Policy

The Coffey Group recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Coffey Group is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them this policy applies to all those employed by the Coffey Group.

The Coffey Group activities are varied through multiple disciplined areas and sectors such as: Building, Civil, Water & Wastewater, Mechanical & Electrical, Environmental and Specialist Engineering Construction Services including Design & Build, Design Build & Operate and Facilities Management. Consequently we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business. Our Corporate Business Ethics Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Coffey Group activities.

The Coffey Group will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- Our Whistle blowing policy encourages the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to relevant members of staff. All Directors have been briefed on the subject. We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of Audits by Directors, Managers Safety managers and Safety Advisors;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement. The Coffey Group will publish the Modern Day Slavery Act Policy Statement on its website for the public, consumers, employee's, NGOs or investors to view.

Signed: 

Odran Madden

Managing Director

Date: 25/10/2016