

Modern Slavery Policy

Purpose

This Policy provides information and guidance to all individuals and organisations associated with Durkan on how the company deals with modern slavery and the role that everyone involved with the business must play in ensuring compliance with The Modern Slavery Act 2015.

Scope

This policy applies to all those working for Durkan, including agency workers, sub-contractors, service providers, joint venture partners and any other agents and third-party representatives. It applies equally to companies acting on behalf of Durkan, who are expected to ensure the same standards within their own organisations and throughout their supply chains.

Core Principles

Durkan recognises that modern slavery is an international crime and a violation of human rights. It is a global problem that transcends age, gender and ethnicities. It may take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which deprive a person of their liberty in order to exploit them for personal or commercial advantage. Modern slavery permeates many aspects of the legitimate economy and the UK construction industry is one of the industries vulnerable to the activities of traffickers and illegal/unlicensed gang masters.

Durkan takes a zero-tolerance approach to modern slavery and it is committed to acting ethically and with integrity in all its business dealings and relationships. It will implement effective systems and controls to ensure modern slavery is not taking place anywhere in the company or in any of its supply chains.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all those working for us, under our control or on our behalf. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chain at the earliest opportunity. You must notify your manager as soon as possible, or the next level of management if you believe your manager might be involved, if you become aware or suspect that a conflict with this policy has occurred, or may occur in the future. Alternatively, you may report it in accordance with the Whistleblowing Policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions at any level of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the next level of management.

Durkan encourages 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 the business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a

concern. If you believe that you have suffered any such treatment, you should inform the Head of HR immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure.

Communication and Awareness of this Policy

Training on this policy, and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and appropriate training will be provided as necessary.

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

Breaches of the Policy

Any employee who breaches this policy will be subject to disciplinary action, which may lead to summary dismissal for gross misconduct.

Durkan may terminate its relationship with other individuals and organisations working on its behalf should they act in breach of this policy.

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