

Modern Slavery Policy

Issue reference:	GH DCI-0001	Doc No:	GHPol 04
Issue No:	04	Issue Date:	08/02/2021
Authorised by:	Eddie McGillicuddy Managing Director	Signed:	

At Glencar Construction, we are committed to improving our practices to combat slavery and human trafficking.

Glencar is committed to ensuring there is no slavery or human trafficking within any part of its business or its supply chains. We strive to achieve this through our recruitment policies and procedures and supplier due diligence processes. For our third-party suppliers we aim to focus on high-risk industries in this area and collaborate with others to concentrate our resources and increase our leverage with brands.

Organisation's structure

We are a provider of Construction services in the Property and Construction sector. Our head office is in the UK and we have sites across the UK.

Our business

Our primary business is construction, which is managed in a typical fashion.

Our supply chains

We use typical subcontractors and suppliers relevant to the construction industry. These are engaged using formal purchase orders and subcontracts.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy 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.

The minimum labour standards Glencar expects from its suppliers as well as requiring compliance with the Modern Slavery Act.

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid

6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk:

Glencar employs solely within the UK. Our recruitment procedures ensure that all prospective employees are legally entitled to work in the UK. All successful applicants must produce on their first day, one of the following: their passport or their driving licence (original documents only, no photocopies). In addition, in order to comply with the Asylum and Immigration Act 1996 requirements, evidence of the right to reside and work in the UK, including work permits and visas, is sought from all successful applicants and checked by HR.

Glencar ensures all direct and indirect employees are paid at least the Living Wage. Glencar carries out reasonable and practical due diligence in the sourcing of goods and services. The supplier vetting process requests information from potential suppliers to assess their suitability as a supplier and provide evidence of their compliance of labour standards, the Modern Slavery Act and the Asylum and Immigration Act, as well as covering other areas of company information, policies and procedures. This enables the procurement team to identify and assess any potential risks.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

As part of our risk management process, we will carry out a risk assessment to consider any existing or future arrangements with third parties. This included identification of:

- All agencies we use to provide staff or services, where there is a heightened risk of poor practice
- Suppliers whose work involves a high level of physical labour; and
- Relationships involving suppliers operating outside the UK, in countries where controls on employment practices may be weaker.

We will assess the responses and identify risk areas so that we can review those relationships in more detail. This is an ongoing exercise.

Training

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 our staff.

Our effectiveness in combating slavery and human trafficking

We will appoint an independent third party, to conduct an externally facilitated review to bring insights on ways to we can tackle slavery and human trafficking. This will use KPIs to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.