

# Modern Slavery & Human Trafficking Policy

Gallagher Group

GGPP 004

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A handwritten signature in black ink, appearing to read "L. Taylor", is positioned to the right of the "Authorised by" text.

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## 1. Introduction

We are a Civil engineering / groundworks / building contractor, supplier of aggregates, supplier of ready-mix concrete, recycling & landfill, property developer & manager of investment property. Gallagher Group is the parent company of a wholly owned subsidiary. The group has its head office in the UK and all trade is undertaken within the UK.

Our business is organised into four business units: Contracting (Gallagher Limited), Plant (Gallagher Plant Limited), Aggregates (Gallagher Aggregates Limited) & Property (Gallagher properties Limited).

Our supply chains include the sourcing of materials principally related to the civil engineering & construction industry.

## 2. Definition

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

The group has an annual turnover in excess of £36m.

## 3. Legal Requirements

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

## 4. Our Policy

### 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.

### Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

- We run our business with skilled managers to ensure optimum control of the work environment;
- Where possible we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the construction industry.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## Supplier Adherence to Our Values

We have zero-tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

The Commercial and Construction Directors are responsible for compliance in their respective departments and for their supplier relationships.

## 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 provide training to relevant members of staff. All Directors have been briefed on the subject.

## Our Effectiveness in Combating Slavery and Human Trafficking

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:

- 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.

## 5. Monitoring and Review

This policy will be reviewed annually by the Board.