

## MODERN SLAVERY ACT POLICY

Version 7  
1st November 2022

P. Flannery Plant Hire (Oval) Ltd are committed to improving our practices to combat slavery and human trafficking. We recognise that slavery and human trafficking remain a real problem in today's society. The company's aim is to responsibly alert 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, who are expected to act upon them.

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 Anti-slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships. This policy is in accordance with [Section 54 of the Modern Slavery Act 2015](#). The board of directors of P Flannery Plant Hire (Oval) Ltd, have approved this policy statement and it applies to all those employed by these companies. This policy highlights our commitment to implementing effective systems and enforcing controls to ensure slavery and human trafficking are not taking place anywhere within our supply chains.

This Policy supports the policies, procedures and requirements documented in our Integrated Management System. 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 when 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 company activities.

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 (contractors, subcontractors, policies, contracts etc.).
2. Continually checking that all employees are both paid at least the minimum wage and have the right to work.
3. We encourage the reporting of concerns and the protection of whistle blowers.
4. The company will not knowingly support or deal with any business involved in slavery or human trafficking.
5. 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 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 at ensuring that slavery and human trafficking do not take place in any part of our business or supply chains:

- Audits carried out 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.

### **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 1<sup>st</sup> November 2021 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

1<sup>st</sup> November 2022

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