

## PS14 MODERN SLAVERY POLICY & PROCEDURE

### Introduction

This statement has been produced in accordance with the Modern Slavery Act 2015 and sets out the actions that McAllister Bros Limited will take to understand potential modern slavery risks related to its business activities and supply chains. This statement relates to actions and activities during the current financial year.

McAllister Bros Limited is committed to preventing modern slavery in its business activities and its supply chains and detailed below are actions that have been implemented, and will continue to be, with the aim of fulfilling this commitment.

### Policies

We are committed to the prevention of modern slavery which includes servitude, forced labour and human trafficking and child labour.

Our Modern Slavery policy is delivered through a range of associated policies and procedures:

- ✓ Ethical Code of Conduct Policy
- ✓ Recruitment Policy
- ✓ Work Safe & Whistleblowing Policy
- ✓ Employee Code of Conduct
- ✓ Environmental Policy
- ✓ Corporate Responsibility Policy

Ultimate responsibility for ensuring prevention of modern slavery is by Leo McAllister, Managing Director (Mainland GB) and Peter McAllister, Managing Director (Ireland).

Responsibility for monitoring compliance to this modern slavery policy is held by Siobhan McAllister, Human Resources Manager. This responsibility includes monitoring of employee salary, employment rights and supply chain communication cascades.

### About McAllister Bros Limited

McAllister Group are involved in drain and sewer planned maintenance, cleaning, CCTV pipeline surveys, liquid waste management, sewer mapping, sewer rehabilitation service including cured in place pipelining (CIPP), patch repairs, lateral repairs and manhole rehabilitation using the no dig technologies and traditional excavation.

The company employs circa 60 employees in the Newry, Northern Ireland office and 25 in the England office based in the South-East of England.

The company's supply chain comprises the supply of pipeline related construction materials, work equipment including specialist drainage and construction equipment and ancillaries. Pipe lining equipment and materials are imported from Germany.

Whilst not a large company and thus not covered by the specific requirements of the Modern Slavery Act, we are key contractors to large companies, and thus form an essential part of their due diligence programmes.

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## Understanding the Risks of Modern Slavery

The key direct internal risks of Modern Slavery to McAllister Bros are:

- No contracts of employment including zero hours contracts;
- Under pay of employees, self-employed contractors and subcontract companies – not paying as a minimum the living wage, and not paying an appropriate market rate for services engaged;
- Excessive working hours – the majority of our direct employees have signed Working Time Opt Out Agreements, however this can lead in some organisation's to excessive working hours, defined as, in line with NHS policy as greater than 56 hours per week, or not providing suitable rest periods between shifts or as a minimum a day off per fortnight;
- Not been entitled to work in the country of employment;
- Poor physical working conditions, including safety conditions;
- Bullying, discrimination and harassment.

In regards our own workers, we shall apply due diligence and ensure that:

- Individuals have the right to work in the country of employment.
- as a minimum a Living Wage is paid
- that pay reflects current market values for the sector and role,
- that working hours restrictions are complied with, and excessive working hours discouraged,
- that bullying, discrimination and harassment is not permitted or tolerated in any form.
- That site conditions are safe and provide a working environment conducive to the protection of the environment, human health and quality workmanship.

In regards our supply chain our company is a medium sized company and thus our ability to influence the supply chain is limited. We will however implement due diligence in our supply chain in relation to modern slavery:

- We will issue supplier questionnaires to all our key suppliers to enable us to undertake compliance checks to our requirements and to legal requirements regards modern slavery.
- Our subcontractor evaluation form requires sub-contractors to declare their conformity to the Modern Slavery Act.
- Our contractual requirements require that modern slavery is not permitted;
- We expect our customers to deliver the same ethical treatment of us as a supplier, particularly in regards to payment terms and conditions, rates of pay and timely payment of applications.

## Staff Training

We will provide all management staff training in relation to modern slavery, particularly providing focused training to our Managing Director.

## Assessing Effectiveness

The delivery of this modern slavery policy shall be monitored and shall form part of annual management performance review.

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### Corrective Actions

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions or externally with the supply chain then appropriate corrective action shall be taken in line with the company's Control of Non-Conformity Procedure. All non-conformity shall be recorded and the required actions implemented in a timely manner.

### Policy Review

This will be subject to review following any lessons learnt, identification of non-compliance and as a minimum annually.

### Policy Approval

As the individual ultimately responsible for company compliance I endorse this policy.

Signed on Behalf of McAllister Group,



**Leo McAllister, Managing Director (GB)**  
5<sup>th</sup> September 2019



**Peter McAllister, Managing Director (Ireland)**  
5<sup>th</sup> September 2019