



## Anti-Slavery and Human Trafficking Policy

The Management of Kane Group Building Services understands Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which deprive an individual of their liberty while others exploit them for personal or commercial gain.

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act").

This document sets out the policy of Kane Group Building Services Ltd (the "Company") with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain.

Kane Group Building Services Ltd operates a zero-tolerance approach to modern slavery. Management is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

### *STEPS FOR THE PREVENTION OF MODERN SLAVERY*

- We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. All our direct employees have National Insurance numbers and are paid directly into their own Bank accounts. Payroll documentation can be made accessible to the appropriate authorities upon request
- Within our business, we use agency labour which is procured through key third party providers. The providers are responsible for vetting all agency staff and ensuring that they adhere to all legal requirements to protect workers from poor treatment and exploitation.
- We include appropriate terms in our contractual documentation - standard terms and conditions and supplier code of conduct - which require Third party contractors to comply with the Modern Slavery Act 2015.
- We operate strict procurement processes, ensuring suppliers adhere to clearly defined policies of sustainability and ethical working practices. We expect these entities to have suitable anti-slavery and



human trafficking policies and processes within their businesses and to cascade those policies to their suppliers.

- We train our Contracts Managers to be vigilant regarding labour on site and, if suspicious, to communicate their concerns to any Director.
- We will assess any instances of non-compliance on a case-by-case basis and tailor any remedial action appropriately. We will only trade with those who fully comply with this statement or those who are taking verifiable steps towards compliance.

#### *RESPONSIBILITY FOR THE POLICY*

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. Managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

#### *ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING*

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected Modern Slavery associated with the Company, or our suppliers, may be reported by employees in this manner.

We aim to encourage 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 our own business or in any of our supply chains.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

A concerned employee may report to a Company Director:

- If he/she has information which leads to the rational conclusion that a person acting on behalf of The Company or its suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

- If he/she has received an approach from a person acting on behalf of The Company who has invited him/her to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed.

#### *DIRECT COMMUNICATION*

The Company also encourages members of the public to send an email, in confidence, to a Company Director at [info@kanegroupbs.com](mailto:info@kanegroupbs.com) should they wish to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

Management will investigate all concerns of slavery and human trafficking and will duly report their findings to the appropriate authorities should they have any suspicions that the Act has been breached.

#### *COMMUNICATION AND AWARENESS OF POLICY*

This policy regarding Modern Slavery will be communicated internally to all our employees through our Staff Handbook and to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Contracts Managers will receive training in how to recognise signs of slavery and human trafficking and in how to raise concerns with Management.

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published no later than the publication of our yearly financial results.

(This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's anti-slavery and human trafficking statement.)

Signed:

A handwritten signature in black ink, appearing to read 'Cathal McMullan', is written over a light blue horizontal line.

**Cathal McMullan**  
**Managing Director**

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**Date: 11.04.2019**