

Modern Slavery and Human Trafficking Statement

Introduction

G Kelly Roofing Contractors Ltd is a Health and Safety Training and Consultancy company. The main principles of the Modern Slavery Act align with our own Company values and as such our company is fully committed to implementing the principles of the Act within our own business practices.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. **G Kelly Roofing Contractors Ltd** have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. This policy does not form part of any employee's contract of employment and we may amend it at any time.

G Kelly Roofing Contractors Ltd is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards. This policy applies to all persons working for **G Kelly Roofing Contractors Ltd** or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Responsibility for the Policy

G Kelly Roofing Contractors Ltd's Managing Director has overall responsibility for ensuring this policy complies with legal and ethical obligations, and that all those under our control comply with it. The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with the Policy

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest to, a breach of this policy. You must notify your management as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier, at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the management at the earliest opportunity.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with the management team.

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.

Compliance with the Policy

We are committed to ensuring no one suffers any detrimental treatment, as a result of reporting in good faith, they're suspicion that modern slavery of whatever form is or may be taking place, in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform the management team immediately.

Communication and Awareness of the Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. **G Kelly Roofing Contractors Ltd** will terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Structure and Supply Chains

We are confident that our general practices ensure the company is compliant and as such we have not identified any instances of non-compliance. However, we recognise the nature of these risks are ever changing and so we can never become complacent in thinking that the work is done. We commit to undertaking all reasonable and practical steps to ensure that slavery and human trafficking is kept out of our company and our supply chain.

Policies on Modern Slavery

We have a Code of Conduct on Ethical Trading which sets out our policy on legislation, child labour, conditions of employment, wages and benefits, health and safety and the environment. The Code of Conduct has recently been updated to ensure it incorporates elements relating to anti-slavery and human trafficking. All company policies are reviewed at least annually and updated as required.

Risk Assessment

We carry out an annual risk assessment to identify the areas in the company that required the most attention. These form the basis for the due diligence process described below.

Due Diligence Processes

We undertake inspections and audits to ensure our standards are being implemented and that local legislation and regulations are complied with. Currently we have no cases of non-compliance have been identified.

Training

The company will arrange training, where required, for all relevant staff.

Furthermore, we will endeavour to raise awareness by distributing literature to be displayed around the company offices.

Measuring Effectiveness

We will undertake an ongoing review process to ensure our employees' can identify and report any instances of suspected non-compliance. We will assess any instances of non-compliance on a case by case basis and tailor remedial action appropriately. We will only trade with those who fully comply with this statement and our policies or those who are taking verifiable steps towards compliance.

This statement has been approved by our Managing Director, who will review and update it as necessary on an annual basis.

Signed on behalf of **G Kelly Roofing Contractors Ltd**



Mr. Steven Robinson
Health & Safety Consultant

Date of issue: 1st September 2024
Date of review: 31st August 2025