

# Byrne Group Anti-Slavery and Human Trafficking Policy Statement

SAFETY / PEOPLE / DELIVERY / RELATIONSHIPS / INNOVATION



Byrne Group is committed to promoting and maintaining the highest level of ethical standards in relation to all our business activities and has implemented this policy to preserve and strengthen these values.

Modern slavery is a crime and a violation of 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 to exploit them for personal or commercial gain.

We have a zero-tolerance policy towards modern slavery, and are committed to acting fairly and with integrity in all our business dealings and relationships. We maintain and enforce effective systems to counter modern slavery in any form.

We ensure transparency in our approach to tackling modern slavery in our business and supply chain through our disclosure obligations under the Modern Slavery Act, 2015.

## Purpose and scope of the policy

Our policy sets out the Company's position on any form of modern slavery and provides guidelines aimed at:

- Ensuring compliance with all applicable laws and regulations that ensure the fair and equitable treatment of people, not just within the UK but in any other country within which the Company may carry out our business or in relation to which our business may be connected.
- Enabling employees and persons associated with the Company to understand the various forms of modern slavery, and to encourage them to be vigilant and effectively recognise, prevent and report any wrong doing, whether by themselves or others.
- Providing suitable and secure reporting and communication channels, ensuring that any information that is reported is properly investigated and effectively dealt with. This includes our confidential hotline.
- Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of modern slavery.

Our policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, interns, agents, suppliers, subcontractors, external consultants, third-party representatives and business partners.

We expect the same standards from our supply chain and their supply chain.

All such persons are required to adhere to the principles set out in our policy, and generally to:

- Comply with any anti-slavery and human trafficking legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- Act honestly, responsibly and with integrity.
- Safeguard and uphold the Company's core values by operating in an ethical, professional and lawful manner at all times.

The Company's rules, procedures and guidelines are set out in our full Anti-slavery and Human Trafficking Policy which is within our Employee Handbook.

## Breaches of this policy

Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Communication and awareness of this policy

We will provide training to all workers to help them understand their duties and responsibilities under our policy.

Our zero-tolerance approach to modern slavery will also be communicated to all business partners at the onset of the business relationship, and as appropriate thereafter.

Signed:

Michael Byrne

Chief Executive, Byrne Group

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