

GALLDRIS MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT AND POLICY

This statement is issued in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the measures that Galldris has taken to ensure that modern slavery or human trafficking is not occurring in our organisation or in our supply chains.

POLICY STATEMENT

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. Galldris has a zero-tolerance approach to modern slavery. We are intent upon acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

THE GALLDRIS BUSINESS

Galldris is a leading civil engineering and groundworks company, operating across a number of sectors including Rail, Housing, Health, Education, Utilities and Transportation. We are committed to acting ethically and with integrity and to maintaining the proper systems and controls designed to prevent modern slavery and human trafficking from taking place in our business or across our supply chain.

This statement will apply to all persons working for Galldris or on our behalf in any capacity. This includes, but is not limited to: employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

OUR SUPPLY CHAIN

Our suppliers play a pivotal role in supporting our business activities. Our reputation depends in part on the quality of the services they provide. For this reason, we work closely with our trading partners to ensure they share our values. Recognising this, we are equally committed to ensuring that there is transparency 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. We prohibit the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and as such, we expect our supply partners to hold their own suppliers to the same high standards.

We require our suppliers to comply with all applicable regulations and legislation relating to safety, working hours, wages, welfare and human rights. For any material or suspected breach of this statement, Galldris will undertake a full and thorough review, which could include a reassessment of the subcontractor working relationship. In conjunction with this, we do believe in supporting our supply partners through training and knowledge-sharing. This extends to holding regular sessions to communicate our expectations.

RESPONSIBILITIES UNDER THE ACT

The Board of Directors and Senior Managers are aware of the risks relating to modern slavery and human trafficking and are intent upon remaining vigilant against it. Supported by the Procurement department, Galldris directors will be responsible for ensuring that all staff and supply chain partners are aware of their obligations under this statement. This is a responsibility that we all carry and as such we press upon all our staff, sub-contractors and suppliers to exercise due diligence; implement the proper vetting procedures and auditing protocols to identify and highlight any Human Trafficking or Modern Slavery where it is suspected of taking place.

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CORPORATE GOVERNANCE FRAMEWORK

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 the business or under our control. All stakeholders are required to avoid any activity that might lead to, or suggest, a breach of this statement.

Staff are required to notify their manager (or the Procurement Department) as soon as possible if they believe or suspect that a conflict with this statement has occurred, or may occur in the future.

Everyone is 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 it is believed or suspect that a breach of this statement has occurred or that it may occur staff must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible. If there is any uncertainty about whether a particular act; or 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, this is to be referred to management in the first instance or the Procurement Department.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this statement, 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 part of our supply chain.

BREACHES OF THIS STATEMENT

Any employee who breaches this statement may become liable to face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We reserve the right, where we feel it appropriate, to refer matters to the relevant authorities and/or associated third parties.

Where a suspected breach of our Modern Slavery and Human Trafficking statement is brought to our attention in relation to a subcontractor or supplier, this will trigger a formal review of the working relationship. If appropriate, Galldris will consider the termination of any existing working relationship. Without exception, Management, Staff and partner stakeholders are expected to act with integrity and honesty at all times.

This statement does not form part of an employee's contract of employment. We reserve the right to amend or update this statement if required.

Donal Gallagher

DIRECTORS

Sean O'Driscoll

