



Modern Slavery & Human Trafficking Policy Statement

Policy Statement

Modern slavery is a crime and gross 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.

Conlon has a zero-tolerance approach to modern slavery and 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 in any of our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, trainees, agents, contractors, suppliers or any other people or bodies associated with the business.

Responsibility for the Policy

Overall accountability for compliance rests with the Board of Directors.

The Managing Director is responsible for the contents of this statement, which will be reviewed and updated as necessary on at least an annual basis.

The QS Director has primary and day-to-day responsibility in relation to our supply chain for implementing this policy and 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.

The HR Director has primary and day-to-day responsibility in relation to those directly employed by us for implementing this policy and 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.

Mitigating Risks

The key areas of our operation that could be affected by slavery and human trafficking are: our directly hired employees; agency workers working on our behalf; supply chain operatives working on our sites, and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

Employees - We verify that all employees have the right to work in the UK upon commencement of their employment. We make all employees aware of their working hours, leave and absence entitlements and other employee benefits via a contract of employment and Employee Handbook.

Agency workers - We aim to only engage agency workers that are provided by suppliers on our Preferred Supply Chain Supplier List. We require all such supply chain members to:

- ensure their agency workers have the right to work in the UK;
- confirm that they do not charge workers a work finding fee; and
- have procedures in place to minimise the risk of recruiting forced or compulsory labour.

Supply Chain Subcontractors - We require all supply chain members to ensure their employees have the right to work in the UK. We consider sub-contractors' approaches to employee rights and any breaches of human rights related legislation during our selection process. We want all supply chain sub-contractors who purchase materials for use on our sites to consider the risk of modern slavery in their own supply chain.

Suppliers - We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on prevention of forced labour. However where materials are directly sourced from outside the UK we consider the risk of slavery and human trafficking as part of our selection process.

Compliance with the Policy

All persons working for Conlon must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains in the responsibility of all those working for us or under our control. All persons working for Conlon are required to avoid any activity that might lead to, or suggest a breach of this policy.

All persons working for Conlon are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage, by reporting it to the Compliance Team.

Communication and Awareness of this Policy

This policy will be communicated to all Conlon employees.

Conlon employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

Due Diligence

In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy. These will be kept under review by the Compliance Team.

Breaches of this Policy

Any breach of this policy, following an investigation, will be treated as gross misconduct and may result in dismissal without notice in relation to those employed directly.

In the case of other parties with whom we do business, we may terminate our relationship with individuals and organisations working on our behalf if they are found not to comply with this policy.



Michael Conlon
Chairman

Date 3rd May 2017