

## **Modern Slavery and Human Trafficking**

### **Introduction**

We believe that modern slavery is a heinous crime that affects communities and individuals across our global society. At Peter Duffy Limited, we are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all our supply chain partners. Our attitude to modern slavery is: zero tolerance.

### **Purpose of this policy**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 and can occur in various forms, including servitude, forced or compulsory labour and human trafficking. All forms involve deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out Peter Duffy Limited's policy, which aims to prevent opportunities for modern slavery to occur within its business or supply chain.

### **Responsibility for this policy**

Ultimate responsibility for the prevention of modern slavery rests with Peter Duffy Limited's leadership. The Board of Directors of Peter Duffy Limited has overall responsibility for ensuring this policy and its implementation comply with legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

### **Our business structure**

Peter Duffy Limited is an independently owned civil engineering and utilities company, delivering civil engineering, utility and plant services across a diverse range of industry sectors including:

- Infrastructure
- Utilities
- Residential developments
- Commercial and industrial developments

We do not exceed the £36m annual turnover threshold (Reference section 54 (2)(b) of the Modern Slavery Act 2015). However, we believe that embedding anti-slavery best practice throughout the business is the right thing to do. We operate only in the UK. We employ 160 and work in a variety of locations throughout the UK.

### **Our supply chains**

Our supply chains include:

- Suppliers of construction products and materials.
- Suppliers of plant and machinery.
- Suppliers of office consumables, equipment and services.
- Sub-contractors.
- Sub-consultants and advisers.

We consider the high risk areas to be sub-contracted labour forces, which could use trafficked or coerced labour, and the use of materials sourced from countries with poor slavery and human trafficking records (e.g. conflict materials, steel or other raw materials).

## **Policy**

We support and respect the protection of human rights within our sphere of influence and have a zero-tolerance attitude to modern slavery. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

## **Due diligence and supplier adherence**

We have conducted reviews to determine which parts of our business are most at risk of modern slavery to enable focus of efforts. As a result of this:

- We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- We operate a Public Interest Disclosure (“Whistle Blowing”) procedure so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

We have conducted reviews to determine which of our supply chains are most at risk of modern slavery to enable focus of efforts. Whilst recognising our obligation to take steps to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not directly control the conduct of individuals and organisations within our supply chains. To underpin our compliance with practical steps, we implement the following measures:

- We strive to build strong and longstanding partnerships throughout our supply chains, which are built on trust and shared values.
- We ensure that new suppliers and sub-contractors are made fully aware of expectations and agree to comply with this policy via our pre-screening processes.
- We introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We ensure that supplier audits are carried out for high risk areas and in the event of the report of a potential issue relating to human trafficking or slavery.
- We ensure that products and materials are sourced from UK based suppliers, who have agreed to comply with this policy.

## **Communication and awareness of this policy**

Our zero-tolerance approach to modern slavery is communicated to all supply chain partners at the beginning of the business relationship via our pre-screening processes and reiterated or updated as appropriate thereafter.

Our workforce has been briefed on the expectations and responsibilities associated with this policy and a copy is made readily available via our online EasyBOP construction management platform.

## **Monitoring for effectiveness**

Adherence to this policy shall be monitored via supply chain partner inspections, supply chain reviews and recruitment / payroll monitoring systems.

## **Breaches of this policy**

Where we identify a supplier issue, if possible, we shall work with them to resolve problems and bring about compliance with our policy requirements. We reserve the right to terminate our relationship with individuals and organisations within our supply chain if they breach this policy.

## **Reporting**

Should we suspect actual slavery or trafficking or hold evidence of such acts we will report to the National Crime Agency by email [public.complaints@nca.gov.uk](mailto:public.complaints@nca.gov.uk) or telephone 020 7238 2626

## **Review of this policy**

This modern slavery policy will be subject to regular and ongoing reviews (at least annually) to ensure its continuing suitability, and to update the requirements where further measures are identified.



**Peter Duffy**  
**Managing Director**