



## UK Modern Slavery Act 2015

### SLAVERY AND HUMAN TRAFFICKING POLICY

#### PN Daly Statement

This statement sets out PN Daly Ltd actions to understand all potential modern slavery as part of the UK Modern Slavery Act 2015 and risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

PN Daly Limited's recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

PN Daly Ltd is absolutely committed to preventing slavery and human trafficking in its cooperate activities and to ensuring that its supply chains are free from slavery and human trafficking. The Company will ensure everyone who works for and with P N Daly is treated fairly, is able to work safely and with respect and has their human rights protected.

#### Progress

During the year P N Daly Ltd deepened its knowledge of slavery and human trafficking. The Company worked with its staff, to educate and raise their awareness of the risks of modern slavery. It continued to be vigilant in the checks when employing new staff or engaging new suppliers and enhanced the Company induction to raise the awareness of Modern Slavery to all new employees and suppliers.

P N Daly understands that to tackle Modern Slavery it must continue this vigilance and efforts must be ongoing to eradicate it completely from the work place.

#### Organisational structure and supply chains

This statement covers the activities of PN Daly Ltd.

PN Daly Ltd is a supplier of gas, water, electricity and telecommunication network design, construction, connection, repair, maintenance and support services.

The organisation currently operates in the United Kingdom.

#### Policies:

Frank Daly (Managing Director) is responsible for all policies relating to human rights. These policies are reviewed annual and have been strengthened to reflect our ethical requirements.

### **Supporting Policies**

The organisation operates the following Policies to support its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- Whistle Blowing policy
- Anti-Bribery and Corruption policy
- Employee Code of Conduct
- Behavioural Code
- Recruitment/Agency workers policy

### **Risk Assessment & Due Diligence**

The following is a process by which the company assesses whether or not particular activities are at high risk in relation to slavery or human trafficking. Although the Company deems itself to be at low risk, due to the majority of the work force being directly employed and as it uses a limited supply chain, a number of measures are in place to monitor the risks.

#### **Recruitment:**

HR processes ensure that those recruited have the correct approvals to work. If any agencies are used or other companies are used to provide staff, the Company will seek to ensure that they follow their own strict obligations under the Modern Slavery act.

HR processes will ensure:

- All recruitment is monitored by the HR team and Operational Management team.
- All recruitment will follow risk assessments on the hiring of staff. Passports and National insurance Numbers with a full address and photographic evidence will be checked at all recruitment stages.

#### **Due Diligence**

PN Daly Ltd undertakes due diligence when considering taking on new suppliers and regularly reviews on the following;

- Evaluating the Modern Slavery and Human Trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.
- Conducting supplier Audits or assessments, which have a greater degree of focus on slavery and human trafficking.
- Creating an annual risk profile for each supplier.

- Taking steps to improve sub-standard suppliers practices including providing advice to suppliers and requiring them to implement action plans.
- Participating in collaborative incentives focused on human rights in general and slavery and human trafficking in particular.
- Suppliers can be checked for their labour standards and compliance in general, modern slavery and human trafficking in particular, and invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct including termination of the business relationship.

### **Training**

People are P N Daly's most valuable asset and it recognises that the appropriate training on modern slavery will increase their awareness as well as mitigating the risk within the business and the supply chain.

In addition, the organisation requires all staff working in recruitment, supply chain, Managers and HR within the organisation to complete training on modern slavery (as a module within the organisations wider Human Rights/ Ethics/ Ethical Trade Training programme. The organisation's modern slavery training covers:

- Business Purchases and practices, which influence supply chain conditions and therefore should be designed to prevent purchases at unrealistic prices, the use of.
- Labour engaged on unrealistically low wages or wages below National Minimum Wage, or the provision of product by an unrealistic deadline.
- How to assess the risks of slavery and human trafficking in relation to various aspects of the business including resources and support available.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example; Modern Slavery helpline, Gang masters Licensing Authority and Stronger Together Initiative.
- What messages, Business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- What steps the organisation should take against is suppliers or contractors who do not implement anti-slavery policies in high risk scenarios, including their removal from the organisations supply chains.



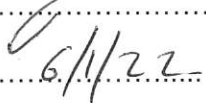
**Measuring Effectiveness**

The Company's arrangements for monitoring, training and communication have been built upon to ensure that it can monitor its effectiveness in tackling Modern Slavery. This is achieved through:

- The Whistleblowing Policy
- Senior Management audits – this is a random interview with new recruits, agency workers or sub-contractor employees, specifically to explore the awareness of Modern Slavery and to check that it is not present within the workplace.
- Ongoing training through induction, tool box talks and corporate communications

During 2018 no evidence was found of modern slavery or forced labour in the workplace. This was established through the internal audits carried out and additionally, no employee contacted the Company or third party to report any concerns.

Signed: ..... 

Date: ..... 

Frank Daly – Managing Director