



Spotlight on...
illegal workers

**CONSIDERATE
CONSTRUCTORS
SCHEME**

Case Study: FP McCann

Slavery and Human Trafficking Policy Statement

INTRODUCTION FROM THE MANAGING DIRECTOR

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

ORGANISATION'S STRUCTURE

FP McCann through its Quarries, Surfacing, Readymix and Precast plants, supply a wide range of heavy building materials to the construction industry. We offer a range of sustainable and innovative product solutions that complement our standard package of products and services. The group has its head office in Northern Ireland and all trading outlets are in the UK.

OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials principally related to the provision of precast concrete products, bitumen coated products and Readymix concrete.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. This Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk:

- **Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour;**
- **With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.**
- **We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.**

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.



TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Completion of premises Audits by Safety, Health and Environmental Managers, Factory/ Quarry Managers and the Human Resource Manager;**
- **Use of labour monitoring and payroll systems to check eligibility of employees in the UK; and**
- **Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

EFFECTIVE SOURCING POLICY AND STATEMENT OF INTENT

FP McCann Ltd commits to:

- **Understanding our supply chains, including health and safety, environmental, labour and human rights issues**
- **Expecting responsible behaviour, as well as quality and value**
- **Working with suppliers to make improvements, where their practices fall short of our expectations**

- **Withdrawing from contracts where improvement is impossible**
- **Respecting suppliers' confidential information and running fair selection processes**
- **Making payments in accordance with our contractual commitments**
- **Under the ethical, social and environmental criteria, suppliers are assessed, among other things, on compliance with relevant legislation and regulations, use of energy and other natural resources, respect for confidentiality, whether they have a civic and responsible attitude, whether they have principles for action defining their commitments and priorities and whether they have an environment policy**

These assessments are reviewed jointly with our suppliers and lead to an improvement plan being drawn up if necessary.

FP McCann Ltd's policy is to seek to purchase goods and services which:

- **Are produced and delivered under conditions that do not involve the abuse or exploitation of any persons;**
- **Have the least negative impact on the environment.**

ETHICAL SOURCING PRACTICES

FP McCann Ltd's policy addresses ethical issues: the key focus is to uphold fundamental human rights, to protect workers and to act within the law.

- **Afford their employees the freedom to choose to work for them**
- **Employees should be free to leave the supplier after reasonable notice is served**
- **Suppliers should not use forced, bonded or non-voluntary prison labour;**

- **Establish recognised employment relationships with their employees that are in accordance with their national law and good practice. Suppliers should not seek to avoid providing employees with their legal or contractual rights;**
- **Can demonstrate a commitment to equality of opportunity for individuals and groups enabling them to live their lives free from discrimination and oppression;**
- **Impose working hours on their staff which are compliant with national laws or industry standards;**
- **Under no circumstances abuse or intimidate, in any fashion, employees and have appropriate disciplinary, grievance and appeal procedures in place;**
- **Work within the laws of their country**
- **Take appropriate measures to ensure the health and safety of their workforce and the wider public;**
- **Support our view that the long-term elimination of child labour is ultimately in the best interests of children, and have taken measures to ensure that child labour is not utilised in their operations;**
- **Do not support, encourage or facilitate the trade in drugs, arms, tobacco, slavery or prostitution; and**
- **Offer wages and benefits that at least meet relevant industry benchmarks or national legal standards.**
- **We will encourage ethical sourcing practices among our suppliers, partner organisations and the broader market.**