



P.J. KEARY LTD

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Modern slavery statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that PJ Keary Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. PJK has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

We supply data collection and surveying services to Utilities and local government in the UK and Ireland

Our high-risk areas

In regular assessment and monitoring of our business operations we consider our involvement with other suppliers and assess possible high-risk areas to ensure that they are free from slavery, servitude, human trafficking and forced labour. We must be diligent in assessing the operations of all the suppliers we engage with. This includes for example receiving adequate assurances from agencies before deploying office cleaning staff.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, 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.
3. Whistleblowing policy. We operate a whistleblowing policy 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.
4. Corporate and Social Responsibility. This statement explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

P J Keary operates a supplier policy and conducts due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We conduct training for our procurement teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain through employee engagement and feedback from employees, the public and law enforcement agencies.

Approval for this statement

This statement was approved by the Board of Directors on 7th January 2019

Name: Patrick Keary
Signature

A handwritten signature in black ink, appearing to read 'P. Keary', with a long horizontal stroke extending to the right.

Date: 7th January 2019