

PETER O'HARE LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made in conformance of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our business or any part of our supply chain. Modern slavery is the term used to encompass slavery, forced and compulsory labour and human trafficking of all ages.

- We recognise that slavery and human trafficking can occur in many 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.
- We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and 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.
- Our recruitment processes are transparent and reviewed regularly. New employees are vetted to ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.
- We have implemented a number of processes to ensure, as reasonably practicable, that our supply chain adhere to our expectations in respect of their workforce.
- Where appropriate we require our supply chain to be either registered with Constructionline or have completed our pre-qualification process. These require our supply chain to demonstrate the steps taken to ensure that slavery and human trafficking is not taking place in any part of their business.
- 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.
- We will adhere to local and national laws
- Workers will have freedom to terminate employment
- We will allow freedom of movement and association
- Any threat of violence, harassment and intimidation will be prohibited
- The use of worker-paid recruitment fees will be prohibited
- Compulsory overtime will be prohibited
- Child labour is prohibited
- Discrimination is prohibited
- Confiscation of workers original identification documents
- Provide access to remedy and compensation

Training:

- We will provide Modern Slavery /training internally to staff and externally to Sub-Contractors
- We have developed additional methods to communicate training delivery in the form of a “webinar.” This has enabled us to expand our delivery and increase risk awareness. This has been applicable not only within our workforce but to sub-contractors

Procurement:

Procurement is a powerful tool to influence business practice. Peter OHare Limited utilises the Cabinet Office Procurement guidelines for commercial and procurement professionals. Our procurement planning, utilising the procurement checklist, has allowed us to further understand the risks we face, identify high and medium risk contractors through analysis of their business area, location, commodity type and map our supply chain effectively. Working collaboratively with our central procurement team has enabled us to decide on the level of risk and therefore what level of contract management is appropriate.

In collaboration with our Commercial Team, we have continued to build upon and developed specific compliance conditions within our invitations to tender, contracts, and legal agreements. The NIHE CT105 is an example of this collaboration.

Key Performance Indicators:

KPIs have been introduced to measure progress against reducing any risk identified to measure performance of any anti-slavery actions undertaken.

KPI's will be introduced for the following:

- Training and capacity building of staff about modern slavery issues, measuring changes in awareness of risk, appropriate decision-making and swift action as appropriate
- Grievance procedures for workers and employees if cases are suspected or found
- Visibility, leverage and oversight of suppliers in relevant goods and supply chains.

Supplier adherence to our values:

We adopt a zero tolerance approach to slavery and human trafficking. To ensure all those in our supply chain, and our contractors, comply with our values we will review our agreements and dealings with suppliers in risk areas to ensure compliance with anti-slavery measures. We support and contribute to the development of a free supplier planning tool enabling suppliers to track and report on actions taken on Modern Slavery. We have endorsed a Supply Chain Code of Conduct. This code is applicable to all suppliers and links directly to the United Nations Sustainable Development Goals. The purpose of the Code is to create awareness across our suppliers of social, ethical, economic and environmental issues.

Debt Bondage:


All Workers will be recruited directly into the Company. See Migration with Dignity Policy.

Non-Governmental Agencies (NGOs):

We will actively work with NGOs to support efforts to prevent and mitigate Modern Slavery.

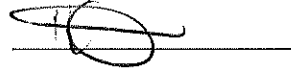
Reporting Victims of Modern Slavery:

If you think someone may be a victim of Modern Slavery or if there is a risk of it occurring please report this without delay to the Head Office using the e-mail address email@poharelimited.co.uk

Signed: 

Peter OHare (Director)

Date: 08/1/2024



Karen OHare (Director)

Date: 08/01/2024