

Slavery and Human Trafficking Policy Statement – Financial year 2017/2018

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes C.J. O’Shea and Company Ltd’s slavery and human trafficking statement for the financial year ending 31 March 2018.

C.J. O’Shea and Company Ltd is committed to improving our practices to combat slavery and human trafficking.

2: Structure of the organisation

We are a family owned construction and development contractor specialising in traditional and design and build office/residential developments including refurbishment projects, predominantly within London and the South East of England. We work with partners on each project, whether they are occupiers, landowners or investors.

Our supply chains include building contractors, sub-contractors, building product suppliers as well as professional consultancy firms providing design and other building related services.

3: Policies

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Whistleblowing Policy
- Anti-bribery and Corruption Policy
- Company Employee Handbook
- Sub-Contractor/Supplier Agreements
- Eligibility to Work in the UK Procedure
- ISO 9001 Quality Management Systems

4. Our Supply chain Due Diligence processes

Our Supply Chain comprises the engagement of sub-consultant and sub-contractor organisations to carry out works and services on our construction sites as well as the sourcing of materials and manufactured products.

We will make sure our suppliers are aware of our policies, and we expect our supply chain to adhere to the same high standards.

As part of our initiative to identify and mitigate risk: -

- We expect our Supply Chain to have suitable anti-slavery and human trafficking policies and processes in place
- 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 direct relationships with all links in the supply chain.

Our Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

5: Risk and compliance

We have produced an anti-slavery and human trafficking policy, which is published within our company employee handbook, to complement our existing policies regarding the human rights of workers.

We play an active role in supplier development and are in the process of adopting various means to clearly communicate our expectations to our suppliers.

We are reviewing the vetting process for our supply chain, and are working collaboratively with them, to endeavour to ensure they can meet their legal requirements under the Act.

We will endeavour to ensure all our suppliers adhere to our anti-slavery policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains. For example, if we find evidence of a failure to comply with our policies we will immediately seek to terminate our relationship with the relevant supplier.

6: Effectiveness and KPIs

We have reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we have set the following KPI:

All current staff/site personnel to have completed anti-slavery and human trafficking training by 30 June 2017.

7: Training

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

8: Further actions and sign-off

The Board of Directors of the Company delegate the approval of this statement on its behalf to the Managing Director of the Company.

A handwritten signature in blue ink, appearing to be 'C.J. O'Shea', written in a cursive style.

Signature:

Managing Director, C.J. O' Shea and Company Ltd