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MODERN SLAVERY POLICY STATEMENT - UK

Modern Slavery Policy Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Elliott Group 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. Elliott Group 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 are an international family owned construction services company with offices and projects in Ireland and the United Kingdom.

Our High Risk Areas

The following activities are considered to be at risk of modern slavery within Elliott Building & Civil Engineering UK Ltd and the list will be reviewed and updated from time to time:

- Use of staff by sub-contractors or suppliers to Elliott Group, where their suppliers' processes are not compliant.
- Employment of sub-consultants; suppliers and sub-contractors by Elliott Group, where their works practices may be non-compliant.

Our Policies

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

- Equality & Diversity Policy – we are fully committed to ensuring that equal opportunities are implemented and maintained. All terms and conditions of service apply on a fair and consistent basis to every member of staff.
- Recruitment Policy – we operate a robust recruitment policy, including conducting checks on work eligibility for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Code of Conduct – this code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

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- Corporate Social Responsibility Policy – Elliott Group has long practiced strong corporate governance guidelines and we continue to advocate corporate responsibility in every facet of our business on a daily basis.

Our Sub-Contractors & Suppliers

Elliott Group operates a supplier policy (IS THIS WITHIN THE APPOINTMENT LETTER?) and maintains a preferred sub-contractor/supplier list. To ensure all those in our supply chain and sub-contractors comply with our values, we conduct due diligence on all sub-contractors and suppliers before allowing them to become a preferred supplier/sub-contractor.

Our anti-slavery policy forms part of our contract with all sub-contractors/suppliers and they are required to confirm that no part of their business operations contradicts this policy. THIS NEEDS TO BE ADDED TO THE APPOINTMENT/CONTRACT LETTERS.

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers who share our values.

Awareness Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains. We intend to deliver toolbox talks to our staff and sub-contractors working on our projects and forward the toolbox talks to our supply chains.

Our Performance Indicators:

We will know the effectiveness of the steps that we are taking to ensure that the slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed: *Noel Elliott*

Dated: 16 September 2021

Noel Elliott
UK Managing Director
Elliott Group