



Modern Slavery & Human Trafficking Policy

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Policy Statement

The term slavery is often associated with the 18th and 19th centuries; however, the practice still continues today in one form or another in every country in the world and is becoming significantly more prevalent in the UK.

The Modern Slavery Act 2015 consolidates slavery and trafficking offenses and introduces tougher penalties and sentencing rules. It ensures that the police and law enforcement agencies have the powers they need to pursue, disrupt and bring to justice those engaged in human trafficking and slavery, servitude and forced or compulsory labour. It also introduces measures to enhance the protection of victims of slavery and trafficking.

Shamrock Group Ltd provides a permanent, interim, contract and temporary recruitment service within the Construction, Rail Infrastructure, Facilities Management, Healthcare and Public Sector markets in the UK.

We oppose all forms of slavery and trafficking and are fully committed to compliance with the Modern Slavery Act 2015 as well as the ILE/UN Guiding Principles.

We have therefore created the following procedure to ensure that all staff, suppliers, business partners, consultants, contractors and temporary workers understand what modern slavery is, how to recognise the common signs of it and how to report it. Staff involved in procurement are instructed on how to conduct due diligence to ensure our supply chains for core products remain slavery free.

Scope of the Policy

It is the duty of all employees, suppliers, business partners, consultants, contractors and temporary workers to comply with this policy. All employees are made fully aware of this policy and of their duties and responsibilities under the above legislation as part of the company's induction programme. Suppliers, business partners and consultants are made aware of the policy as part of their contract with us.

Shamrock Group Ltd has a published Modern Slavery Statement on its website, which can be found at www.shamrockgroup.ie

Responsibilities

It is the direct responsibility of the Head of HR and Modern Slavery Champion to ensure the implementation of this policy on a day-to-day basis; however, all employees have a responsibility to accept their personal involvement in applying it and must be familiar with the policy and ensure that it is followed by both themselves and employees, contractors and temporary workers for whom they have a responsibility.

This policy will form part of the company induction training and is documented in the Employee handbook which in turn forms part of each employee's contract of employment.

Disciplinary action may be taken against any employee who acts in breach of this policy. Disciplinary action may include summary dismissal in the case of a serious breach or repeated breaches. In other cases, it may include a verbal or written warning. Such action will be taken in accordance with the Company's disciplinary procedure. Breaches of this policy may also result in the employee responsible being held personally liable if legal action is taken in relation to modern slavery issues. All staff have a

responsibility to be vigilant, looking out for signs of modern slavery in the workplace and reporting these immediately in line with our Whistleblowing procedure.

For contractors or temporary workers, the assignment may be terminated immediately and the contractor or temporary worker may not be offered further work until the outcome of the enquiry has been completed.

Suppliers, business partners and consultants risk termination of their contract with the company, if found to be in breach.

What is Modern Slavery?

Modern slavery is a broad term which encompasses the offences of slavery, servitude and forced or compulsory labour and human trafficking. Whilst varied in nature, all forms of modern slavery involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

There are many different characteristics that distinguish slavery from other human rights violations, however only one of these needs to be present for slavery to exist. Someone is in slavery if they are:

- Forced to work – through mental or physical threat
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or has restrictions placed on his/her freedom of movement

Contemporary slavery takes various forms and affects people of all ages, genders and races. Common forms of Modern Slavery include:

- **Forced labour** - any "work or service which is exacted from any person under menace of any penalty". People are in a forced labour situation if they enter work or service against their free will and cannot leave it without penalty of the threat of penalty. This does not have to be physical punishment or constraint – it can also take other forms such as the loss of rights or privileges, retention of identity papers or threats of denunciation to immigration authorities. Almost all slavery practices contain some element of forced labour. It is frequently found in labour intensive and/or under-regulated industries such as agriculture & fishing, domestic work, construction, mining, quarrying, manufacturing, processing, packaging, prostitution & sexual exploitation, market trading and illegal activities.
- **Bonded labour** - a person becomes a bonded labourer when their labour is demanded as a means of repayment for a loan. The person is then tricked or trapped into working for very little or no pay and debts are often passed from generation to generation.
- **Trafficking in persons/human trafficking** – this is the act of recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or receiving payments/benefits. When trafficking leads to forced labour, it means that people are tricked, deceived or coerced into travelling to a job that either never existed or does not meet the agreed terms and conditions. The victim may have consented to the travel (e.g. where they have been deceived by a promise of a better life or job). Trafficking does not need to be across a border – it may be within the country. Furthermore, exploitation does not need to have taken place – trafficking in persons will be considered to have taken place simply if the movement of the individual was with the intention of exploiting them.
- **Descent-based slavery** - a situation where people are born into a 'slave class', caste or a group viewed as being in slavery by other members of their society. If one's mother is in slavery, one is born into slavery.

- **Child slavery** - includes children who are used by others who profit from them including prostitution or pornography, forced begging and petty theft, the drug trade, forced labour (including domestic work) and forced participation in armed conflict.
- **Slavery in supply chains** - many of the products we buy and use every day were made using forced labour at some point in production. This is not just about a company's suppliers, but the suppliers of suppliers right back to the raw material.
- **Forced and early marriage** - covers children under the age of 18 and can be referred to as slavery if one or more of the following elements are present:
 - If the child has not genuinely given their free and informed consent to enter the marriage.
 - If the child is subjected to control and a sense of "ownership" in the marriage itself, particularly through abuse and threats, and is exploited by being forced to undertake domestic chores within the marital home or labour outside it, and/or engage in non-consensual sexual relations.
 - If the child cannot realistically leave or end the marriage, leading potentially to a lifetime of slavery.

High Risk Sectors

Modern slavery is a higher risk in sectors where work is:

- Labour intensive
- Unskilled
- Irregular
- Supplied through recruitment intermediaries
- Informal (e.g. home-based workers)
- Geographically remote
- Outsourced to third-parties
- Undertaken in lower tiers of the supply chain with less direct oversight and no contractual relationship

High risk sectors include:

- Food, garment and general merchandise manufacturing
- Agriculture and forestry
- Fishing & maritime
- Mining
- Utilities and construction
- Cleaning, catering & hospitality services in restaurants, hotels and bars

Commons signs of Modern Slavery

Modern Slavery is a hidden crime because it can be difficult to identify a victim. Common signs include:

Physical appearance where a person:

- Lacks health care/dental care
- Appears malnourished
- Appears neglected and scruffy, dirty or poor hygiene (e.g. constantly wearing the same clothing/inappropriate clothing)
- Appears tired/exhausted
- Appears drugged or drunk
- Shows signs of physical and/or sexual abuse, physical restraint, confinement, or assault.

Psychological signs where a person:

- Is fearful, anxious, depressed, submissive, tense, or nervous/paranoid
- Appears anxious or stressed
- Appears withdrawn
- Appears angry or agitated
- Appears traumatised or confused
- Avoids eye contact
- Is unable to express themselves
- Is reluctant or afraid to seek help/speak to the authorities or rejects help when offered
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Isolation where the person:

- Is not allowed to travel on their own
- Rarely interacts with others or is unable to speak English
- Is unfamiliar with their neighbourhood or where they work
- Seems under the control of others (e.g. allows other to speak for them or seeks consent from someone else in the workplace)

Lack of control where the person:

- Has few or no personal possessions
- Is not in control of his/her own money, no financial records, or bank account
- Is not in control of his/her own identification documents (ID or passport)
- Is not allowed or able to speak for themselves (a third party may insist on being present and/or translating)
- May wear the same clothes day in day out or clothes that are inappropriate for the work being done

Poor living conditions which are:

- Dirty cramped environment
- Over-crowded accommodation
- Involve living and working at the same place

Unusual travel times where the person:

- Maybe dropped off and collected for work on a regular basis or not allowed to travel on their own
- Appears to want to work all hours and days available

Actions to Reduce the Risk of Modern Slavery in the Workforce

Shamrock Group Ltd will:

- Ensure all suppliers, employees, contractors and temporary workers are aware of what constitutes modern slavery and the common indicators to enable them to identify victims more easily.
- Conduct face-to-face interviews with employees and workers with questions designed to identify whether the prospective employee / worker is likely to be subject to any form of modern slavery. We also:

- Conduct face-to-face checks of original right to work documentation.
- Only pay wages into a bank account that is in the name of the worker (in individual or joint names).
- Monitor multiple occurrences of workers with the same home address, phone number, next of kin or bank details.
- Ensure that employees, contractors and temporary workers are advised of their rights under our Ethics and Labour Standards and Whistleblowing Policies and associated legislation and that they know how to raise a grievance or report breaches.
- Ensure that suppliers, customers, business partners and others who are directly linked to our business operations have received a copy of this policy understand that we have a zero-tolerance approach to modern slavery.
- Conduct risk assessments to determine which parts of our business are most at risk of modern slavery or human trafficking so that our efforts can be focussed on those areas.
- Walk away from business or contracts that we suspect may expose us to organisations that condone or use modern slavery practices either directly or indirectly and report any supplier or partner to the appropriate law enforcement body if we suspect them of misconduct in this area.
- Put in place procedures for reporting concerns over modern slavery within the company's operations, and communicate these effectively including a Whistleblowing Policy and clear grievance procedure and ensure that employees, contractors and temporary workers understand that they can report unethical conduct without fear of reprisal or retaliation.
- Follow up any reports or suspicions relating to modern slavery or human trafficking.
- Ensure compliance with associated company policies including its:
 - Purchasing & Procurement Policy.
 - Ethics & Labour Standards.
 - Whistleblowing Policy.
- Provide a copy of this Modern Slavery & Human Trafficking Policy to anyone who makes a written request for it within 5 working days from receipt of the request.
- Maintain corporate membership of APSCo and take advice from them to ensure our code of conduct/practice contains current best practice for minimising risks associated with modern slavery & human trafficking.
- Comply fully with the ETI Base Code including the April 2014 Amendment as detailed below.

The ETI Base Code

Shamrock Group Ltd complies fully with the ETI Base Code:

1. Employment is freely chosen. There is no forced, bonded or involuntary prison labour and workers are not required to lodge "deposits" of their ID papers with us or our clients and are free to leave after reasonable notice.
2. No employee will be prevented from joining or forming a staff association or trade union, nor will any employee suffer any detriment as a result of joining, or failing to join, any such organisation. Representatives will not be discriminated against and will have access to carry out their functions in the workplace.
3. Working conditions are safe and hygienic and adequate provisions are taken to prevent accidents and injuries to health by minimising hazards in the workplace. In line with our Health & Safety Policy, all employees will receive health & safety induction training.
4. Child labour will not be used and Shamrock Group Ltd will not knowingly engage with organisations that use child labour.
5. As a minimum we pay the living wage to all employees and they will receive a written contract detailing their employment conditions. Employees will be made aware of the terms and conditions of their employment or engagement from the outset. In particular employees must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Employees must also be allowed such annual leave, sick leave, maternity / paternity leave and

such other leave as is granted by legislation as a minimum. Deductions from wages as a disciplinary measure is prohibited and all disciplinary action will be recorded.

6. Working hours will not be excessive and contracted hours shall not exceed 48 hours per week unless the employee has opted out of the working time regulations. Overtime is voluntary and the total hours worked in a week shall not exceed 60 unless exceptional circumstances apply.
7. In line with our Equality, Diversity & Inclusion Policy, we do not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on any protected characteristic as identified in the Equality Act 2010. All employees must be treated equally. Employees with the same experience and qualifications should receive equal pay for equal work.
8. To every extent possible regular employment will be provided.
9. No harsh or inhumane treatment is allowed including physical abuse or discipline sexual abuse or the threat of such abuse or intimidation.

Supply Chain

Our purchasing strategy is underpinned by commitment at all levels in the business including the CEO and Board, and is designed to:

- Help us identify unintentional purchasing practices which may contribute to the root causes of exploitation.
- Identify suppliers who may not meet our high standards and help them to either improve or remove them from our supply chain.
- Ensure that we have clear policies in place in addition to this policy including Ethics & Labour Standards, Anti-Bribery & Anti-Corruption and Whistleblowing.

We seek positive assurance from formal suppliers that they agree to comply with the principles of all relevant company policies which will form part of their contract. Formal suppliers are required to demonstrate that they comply with our policies and that, in turn, the contracts they have in place with their own suppliers and subcontractors reflect our standards as a minimum.

Specific actions taken to identify and mitigate risk areas in our supply chain include:

- Conducting due diligence with formal suppliers with the aim of ensuring we do not purchase products where slavery or human trafficking may form part of the production process. This includes:
 - Asking all suppliers to complete a modern slavery and human trafficking questionnaire (predominantly yes/no answers).
 - Analysing responses provided and using a RAG system to establish the level of risk. Suppliers who fall into the “red” or “amber” categories in any area surveyed will then be subject to a follow up call/audit to probe further and agree appropriate amendments to their processes and procedures. All calls and actions will be documented, and any supplier failing to make appropriate improvements will have their contract terminated and be removed from our supply chain. Any supplier falling into the “black” category will not be engaged.
 - Establishing supplier subcontracting practices and avoiding complex supply chains where such risks are increased.
- Ensuring contracts are based on the “Employer Pays Principle” and that suppliers reflect this in their contracts and service levels throughout their supply chains (including sanctions in the case of violation and requiring reimbursement of any fees found to have been paid by workers).
- Requiring suppliers to inform their workers of their rights in the workplace and have a clear victim-centred process for reporting forced labour or labour trafficking (anonymously without fear of retribution).

- Ensuring suppliers have a clear mechanism for capturing and managing employee/worker grievances and once identified, for harm to be remediated quickly and where appropriate, reported to the relevant authorities.
- Ensuring that contracts have clauses that allow us access to undertake announced and unannounced supplier audits.
- Ensuring that ethical considerations are weighed against commercial factors when evaluating bids/tenders or negotiating contracts to ensure a realistic price is paid for the goods/services, so reducing the likelihood of making demands on the supplier that may lead them to abuse human rights or subcontract to less ethical supplier.
- Undertaking supplier reviews to include:
 - Forecasting for requirements to mitigate potential adverse impacts on workers.
 - Review of company policies, procedures and behaviours which may unintentionally create an adverse impact on workers.
 - Site visits that allow observation and engagement with workers.
- Where issues are found, agreeing a corrective action plan with SMART actions which will be followed up to confirm progress and terminating contracts with any supplier who is unable or unwilling to improve.

Reporting of Suspected, Alleged or Confirmed Cases of Modern Slavery & Human Trafficking

Any suspected incidence of modern slavery or human trafficking will be taken seriously and may be reported confidentially in line with the company's Whistleblowing Policy or grievance procedure. Employees, contractors and temporary workers are required to familiarise themselves with this policy and to inform their Line Manager if:

- They suspect an employee or person acting on behalf of Shamrock Group Ltd, a supplier or person acting on behalf of a supplier is seeking to exploit another in a way which could amount to modern slavery.
- They have received an approach from a person acting on behalf of Shamrock Group Ltd or a supplier inviting them to participate in an act which could result in an offence under the Modern Slavery Act 2015 being committed.
- They have information which leads to the rational conclusion that a person acting on behalf of Shamrock Group Ltd or one of our suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Any employee, contractor or temporary worker can expect full protection when making such a disclosure and will not suffer detriment or reprisals of any type for doing so. Anyone raising a genuine concern in good faith will be protected, even if they turn out to be mistaken. Any claim or allegation found to be malicious or vexatious will however result in disciplinary action being taken against the employee.

Details of all such reports will be recorded by the company and audited at least annually.

Employees may wish to contact the Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to call for more information and guidance on what to do next.

If a specific case of modern slavery is identified in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used.

Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

Signed: 

Name: Chris Coyle

Designation: Director

Date: 15th April 2026