

Modern Slavery Policy



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Document Release History

Revision	Date	Reasons for Issue / Re-Issue
1	31/03/2017	Initial release
2	26/11/2019	Revision
3	20/05/2020	Revision
4	16/12/2020	Reviewed & Signed

Document Approval

Name	Date
Sinead Larkin	31/03/2017
Sinead Larkin	26/11/2019

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1. PURPOSE AND KEY PRINCIPLES

1.1 Modern slavery is a criminal offence under the Modern Slavery Act UK2015 (the “Act”). The Act imposes obligations on organisations of a certain size which carry on a business in the United Kingdom. “Modern slavery” refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults;
- the trafficking of adults into conditions of labour exploitation;
- the trafficking of adults into conditions of criminal exploitation;
- the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation.

“Human trafficking” involves the recruitment, transfer or obtaining of an individual through coercion, abduction, fraud or force to exploit them. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

Modern slavery includes victims who have been brought from overseas and vulnerable people in the UK and in Ireland who are forced to work illegally against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

Estimates of the number of victims of modern slavery in the UK and Republic of Ireland have markedly increased in recent years.

KTL has adopted this policy with the aim of preventing opportunities for modern slavery occurring within its business and supply chains. In this policy, the term ‘modern slavery’ has the meaning given to that term in the Act.

1.2 This policy applies (a) to all employees, officers and directors of KTL (b) to agents, vendors, contractors, representatives, advisors and other third parties acting on behalf of KTL and (c) to contractors and suppliers of goods and/or works or services to KTL.

2. POLICY STATEMENT

2.1 KTL has a zero-tolerance approach to modern slavery. 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. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all of our contractors, suppliers and other business partners.

2.2 In summary:

- We have a zero tolerance attitude to modern slavery.
- We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.

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- We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

3. PREVENTION OF MODERN SLAVERY

3.1 In order to prevent the occurrence of incidents of modern slavery within our own business and throughout our supply chain we shall:

- identify, monitor and assess those areas of our business and supply chain most at risk from modern slavery and implement initiatives to enhance risk management effectiveness;
- engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Act, at all times;
- incorporate anti-slavery and human trafficking obligations as part of our procurement agreements and contractual processes and, where appropriate, carry out an audit and/or investigation of the activities of those contractors, suppliers or business partners deemed high risk; and
- provide training to relevant employees to facilitate achievement of the objectives of this policy.

4. ROLES AND RESPONSIBILITIES

4.1 KTL management has overall responsibility for this policy. The key roles and responsibilities within KTL in relation to this policy are as follows:

4.2 Board

- Determination of corporate policy in respect of the Act (i.e. this policy), and
- Approving the annual statement required by the Act.

4.3 SHEQ Committee

- Supporting the ongoing implementation of this policy which may include regular review of the internal control framework and controls identified as being needed to drive compliance with this policy.

4.4 Management

- Day-to-day operational responsibility for the implementation of this policy,
- Allocating sufficient and appropriate resources to implement and ensure compliance with this policy including ongoing training and awareness,
- Ensuring that all managers and other staff who may deal with concerns or investigations under this policy receive appropriate training, and
- Operating and maintaining internal control systems to prevent the occurrence of modern slavery in our supply chains.

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4.5 Employees (and third parties working for us or under our control)

- Conducting business in a manner such that the opportunity for any incidence of modern slavery is prevented,
- Avoiding any activity that might lead to, or suggest, a breach of this policy, and
- Reporting any suspected incidents of modern slavery.

5. REPORTING INCIDENTS

5.1 Employees (and agency staff, trainees, external consultants and contractors working with KTL) are encouraged in the first instance to report any suspected wrongdoing to their Head of Department who will raise the matter with the HR Manager. Alternatively, employees can raise the matter directly with the HR Manager.

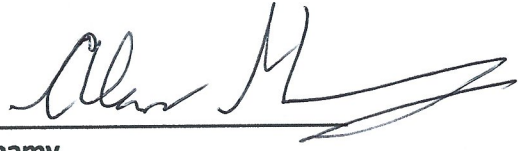
Any reports received will be followed up in accordance with the Whistleblowing Policy.

Any other third party, including members of the public who have any concern, issue or suspicion of modern slavery in our business or related supply chain should write with full details to the HR Manager by emailing to Sinead.larkin@ktl.ie or by post to the HR Manager, KTL, Unit P M7 Business Park, Newhall, Naas, Co Kildare.

6. POLICY VIOLATION

6.1 An employee or contractor involved in a wrongdoing in breach of this policy may:

- face employee disciplinary procedures, which may in turn result in penalties being imposed on that employee (up to and including dismissal).
- be reported to the relevant person's employer which may in turn result in the termination of the service contract with the contractor, contracting company, or agency worker. KTL may also take action to recover any losses sustained, which may include the issuing of civil and/or criminal proceedings against the employee / contractor and/or other individuals concerned.

Signed: 
Alan Hanamy
CEO.

Date: 16/12/20

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7. REVIEW OF POLICY

7.1 Following its initial adoption, this policy will be reviewed on an annual basis. It may be revoked, replaced or changed at any time. Staff will be informed of any material changes made to the policy.

8. RELATED POLICIES AND PROCEDURES

Please refer to the following KTL policies and procedures which can be found on SharePoint:

- SHEQ 217 – Business Ethics Policy
- SHEQ 305 - Company Handbook (Whistleblowing Policy)
- SHEQ 007 – Purchasing & Subcontracted Services Procedure