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		Prepared By:	GML
		Authorised by:	P McFlynn

Modern Slavery & Human Trafficking Statement

1. Our Business & Supply Chain

CivCo operates as a Main Contractor within the UK and Ireland construction sector. Our core services include civil engineering for both the private and public sectors. We operate primarily in Northern Ireland, engaging directly with contractors, subcontractors, labour providers, and supplies of construction materials, tools, and plant.

2. Our Policies on Modern Slavery & Human Trafficking

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business, or across our supply chains. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships, including;

- Anti-Slavery and Human Trafficking Policy
- Code of Conduct and Ethics
- Whistleblowing Policy
- Responsible Procurement Policy

These policies are regularly reviewed and are embedded into our company culture, staff inductions and staff training.

3. Due Diligence Processes

To identify and mitigate the risks of modern slavery, we have implemented due diligence procedures including:


- Vetting and assessing new suppliers and subcontractors for compliance with our standards.
- Requiring labour providers and subcontractors to confirm their own modern slavery compliance.
- Conducting audits and site checks to verify working conditions.
- Ensuring all workers are legally entitled to work in the UK.

Where concerns arise, we investigate and take appropriate action, including termination of contracts if necessary.

4. Risk Assessment & Management

The construction industry is recognised as a high-risk sector for modern slavery, particularly in relation to low-skilled labour and the use of subcontractors. We assess risk based on:

- Type of work
- Country of origin of workers
- Recruitment practices of labour suppliers

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We prioritise high-risk areas for additional checks and controls, including site visits and anonymous worker interviews.

5. Training & Awareness

We provide training to relevant staff to raise awareness of the risks of modern slavery and how to identify signs of exploitation. This includes:

- Induction training for new employees, Contract Managers & Site Managers
- Toolbox talks and briefings on modern slavery risks
- Access to external training resources where appropriate

We also ensure that our labour providers are similarly training their staff on modern slavery and workers' rights.

6. KPIs to Measure Performance

We monitor our effectiveness in combating modern slavery through the following KPIs:

- Number of suppliers and subcontractors assessed for modern slavery compliance
- Number of audits or inspections carried out
- Number of reports raised through whistleblowing or grievance procedures
- Follow-up actions taken in response to concerns

7. Future Actions & Continuous Improvement

We are committed to continuous improvement. Over the next financial year, we plan to:

- Expand audit coverage to more high-risk suppliers
- Enhance training materials for site supervisors and project managers
- Work collaboratively with industry groups to share best practices
- Introduce a supplier code of conduct aligned to the Ethical Trading Initiative (ETI) Base Code



Paul Mc Flynn
03 May 2025



Niall Mullan
03 May 2025