

## Annual Statement Slavery and Human Trafficking Statement

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### **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that FK Lowry 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.

The Act requires certain businesses to provide disclosure concerning their efforts to address the prevention of slavery and human trafficking in their supply chains. These disclosures are intended to provide clients the ability to make better informed decisions about the services they buy and companies they support.

### **OUR GROUP STRUCTURE**

Lagan Specialist Contracting Group is a private family owned construction business which provide specialist contracting and services solutions throughout the UK, Ireland and overseas.

We are committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and that of our supply chain.

### **OUR POLICY ON ANTI-SLAVERY AND HUMAN TRAFFICKING**

Our Anti-Slavery and Human Trafficking Policy reflects a long-standing commitment to acting ethically and with integrity in all of our business relationships, supported by the development and implementation of effective systems and controls.

We recognise that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to encompass various forms of coerced labour. We believe that working in partnership with our clients, community stakeholders and supply chain in a sustainable way enables us to find practical, safer methods of ethical trading free from slavery and human trafficking.

In addition to the Anti-slavery and Human Trafficking Policy, we have several internal policies to ensure that we are conducting business in an ethical and transparent manner:

- Anti-Bribery and Corruption Policy
- Recruitment and Selection Policy
- Whistleblowing Policy

### **OUR ANTI-SLAVERY AND HUMAN TRAFFICKING ASSURANCE PROCESS**

As part of an initiative to identify and mitigate risk in respect of slavery and human trafficking, we have:

- Developed and agreed our Anti-Slavery and Human Trafficking Policy;
- Conduct due diligence on all suppliers to confirm their compliance with the Modern Slavery Act before allowing them to become a preferred supplier;
- Reviewed our recruitment processes to ensure they continue to be both transparent and thorough. We have robust procedures in place for vetting new employees and ensuring we are able to accurately confirm their identities.
- Ensure that all staff have a written contract of employment

# FK LOWRY

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and in our business, we will provide training to our staff that is proportionate to the level of risk.

## DEVELOPING FOR THE FUTURE

As our approach to slavery and human trafficking develops, we will assess how well we are doing and whether additional procedures may be necessary. We are committed to reporting publicly about our performance each year.

This statement has been reviewed by our Chief Executive Officer and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for FK Lowry for the financial year ending 31 March 2020.

Date: September 2020

## AUTHORISATION



**Kevin A Lagan**  
Chief Executive Officer



**Jill Harrower-Steele**  
Head of Legal / Company Secretary