

1 - Introduction

Modern Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the potential risk of their presence, however small, in particular within our supply chain. All of our Staff are expected to report concerns and our management is expected to act upon them. This document confirms that O'Keefe Construction (Byrne Group) Limited and O'Keefe Demolition (Byrne Group) Ltd are committed to eliminating slavery and human trafficking from within our supply chains, will identify and address potential pathways for these activities, and is compliant with Section 54, Part 6, of the Modern Slavery Act 2015 (the Act).

2 - Organisational Structure

The O'Keefe Construction (Byrne Group) Limited and O'Keefe Demolition (Byrne Group) Ltd scope of operations includes the provision of Civil Engineering and Construction Services to the building industry. We specialise in groundworks, heavy civils, reinforced concrete frame, demolition, and associated works. Unusually for the industry, the company employs a substantial proportion of its workforce directly and some additional personnel are employed through agencies.

3 - Our Policies on Slavery and Human Trafficking

We are committed to ensuring that no slavery or human trafficking exists within our supply chains. This policy reflects our commitment to acting ethically and with integrity in our business endeavours. We are determined to implement and enforce effective systems and controls to ensure that slavery and human trafficking does not take place within our supply chains. The following is a non-exhaustive list of additional policies/documents that assist with our approach to prevent slavery and human trafficking in our operations:

- Anti-bribery and Corruption Policy
- Whistle Blowing Policy
- Social Value Policy
- Supply Chain Pre-qualification questionnaire
- ISO 9001 Quality Management System

4 - Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk:

Our purchasing activities are centralised through a single department to ensure optimum qualification of new of supply chains, and the pre-qualification process includes a review of potential suppliers' Anti-slavery and Human Trafficking Policy.

We endeavour to build enduring relationships with local suppliers and make clear our ethical business expectations.

We prefer to source raw materials from British or European companies, and we expect these businesses to have reciprocal anti-slavery and human trafficking policies and processes so as to exclude potentially unethical suppliers from the supply chain.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

5 - Risk Identification

Manufactured products that we source are supplied to us in compliance with the Construction Products Regulations and we view products that bear CE/UKCA marking to be of low risk. We occasionally source raw materials relating to our construction activities, such as aggregates but, as these are costly to transport, all such materials are sourced within the United Kingdom.

We have identified potential pathways where forced or compulsory labour might enter our supply chain.

6 - Risk Management

We have taken action to reduce the risk of slavery and human trafficking in our operations:

We included a review of potential suppliers' Anti-slavery and Human Trafficking Policy in our pre-qualification process, undertaking additional due diligence on labour agencies.

We updated our Terms and Conditions forbidding the use of forced labour, child labour, or physically abusive disciplinary practices. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

All employees are required to provide evidence that they may legally work within the United Kingdom, as fraudulent documents can be an indication of modern slavery.

In support of our policy, and Anti-Slavery Day, which was on the 18th of October 2023, we delivered an awareness campaign across our sites and premises. The briefing session, and supporting poster, included examples of modern slavery, how people are at risk, signs to look out for and internal and external reporting procedures.

We offer information and training to our decision makers (see next section).

7 - Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors and members of our Buying Department have been briefed on the subject. Information shall be made available concerning Human Rights, Basic Working Conditions, and Corporate Responsibility. This statement is made pursuant to Section 54, Part 6, of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the 2022/2023 financial year. This document is displayed on the homepage of the company website.

Authorised by:



Marc Daly
Managing Director
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