

## MODERN SLAVERY POLICY STATEMENT

### Organisation

This statement applies to Sheehan Group of Companies, Sheehan Haulage & Plant Hire, John Sheehan Oxford Ltd, Sheehan's Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2021 - 2022.

### Organisational Structure

The Sheehan Group operates on a unique level. Established over 40 years ago by Mr John Sheehan, it is now a well-regarded name in the building and civil engineering industry, delivering construction projects as well as associated complementary services.

Our depth of understanding, experience and competence enable us to provide a fully in-house solution to tackle even the toughest challenge, providing all the reassurance of quality and safety you would expect when investing in a unique large-scale construction project.

Always maintaining our family ideals, we treat every project individually. It is our people who get to grips with a problem; and our people who evaluate the situation to deliver the appropriate solution. All solutions focus on our corporate social responsibility, with sustainability at the core from start to finish.

The labour supplied to the Organisation in pursuance of its operation is carried out primarily in Oxfordshire however we do offer our services to our neighbouring counties.

### Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

### Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

### Supply Chains

In order to fulfil its activities and assess the risk of Modern Slavery and Human Trafficking in our supply chains the organisation will.

- Assess and audit suppliers.
- Identify and assess potential risk areas when engaging new suppliers.
- Review our existing supply chains by assessing the potential for changed risk, including the possibility of re-auditing a supplier.

**Potential Exposure**

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

**Steps**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place within its value chain.

**Slavery Compliance Officer**

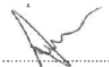
The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Name Christopher Sheehan

Position Managing Director

Signature



Date 01/10/2024