



## MODERN SLAVERY POLICY

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### **Legislation**

McDermott Developments Ltd are aware of their duties under the The Modern Slavery Act 2015 and work continually to ensure compliance.

### **Statement of Intent**

McDermott Developments Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure modern slavery is prevented within our business. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships

This policy confirms how McDermott Developments Ltd and those who work for us uphold a zero-tolerance position on modern slavery. It also provides information and guidance for those working for McDermott Developments Ltd.

### **Organisation Structure**

All employees and subcontractors of McDermott Developments Ltd will be paid a fair wage in return for their work. The minimum fair wage will be determined in line with guidance available from ACAS and HMRC.

Bonded working, that is working to pay off a debt to the company, is not permitted.

The number of hours worked by an individual will not be exploitative and will also be in line with the Working Time Regulations.

Seamus McDermott is the named responsible person for ensuring efforts are made to investigate and remediate the risk of modern slavery in the business and/or supply chains.

All Directors, Employees and those acting on behalf of McDermott Developments Ltd are responsible for identifying and reporting instances of potential instances of modern slavery, bonded working or human trafficking.

### **Supply Chains**

All procurement processes will include for paying individuals a fair wage. It is the policy of McDermott Developments Ltd to tender with a value which provides a fair wage to all employees engaged on the contract.

If a supplier or client are found to have been convicted of modern slavery offences, the contractual obligations of McDermott Developments Ltd will be met then the relationship with the supplier or client dissolved until a time that they become compliant.

Supplies will be purchased from organisations and companies with modern slavery policies in place.

### **Slavery and Human Trafficking**

The right to work of all persons employed by McDermott Developments Ltd will be checked prior to employment. Due Diligence will be undertaken on labour only subcontractors to ensure they too have the right to work.

If information arises indicating that an employee or labour only subcontractor has been, or is suspected to have been, a victim of human trafficking, the Modern Slavery Helpline will be contacted on 08000 121 700.

### **Due Diligence**

Prior to new suppliers being used, checks on the company's position on modern slavery will be verified. This will be by obtaining a copy of their modern slavery policy and the contact details for the person to report instances of suspected modern slavery to. The suppliers key performance indicators to measure the effectiveness of the steps being taken will be evaluated.

### **Risk Assessment and Management**

An assessment will be made as part of the due diligence when working with a new company.

We only trade with clients and suppliers within the United Kingdom and European Union to reduce the risk of global supply chains where protection of breaches of human rights can be hidden and are more likely.

We do not trade with companies that permit bonded labour. Due diligence is undertaken to ensure companies do not permit bonded labour to work off a debt to the employer.

Banks and financial institutions used by the company are subjected to due diligence to ensure there is no link to supporting modern slavery or bonded labour in operations or supply chains or through money laundering.

Due diligence will be undertaken at the tender stage of any contract to ensure long standing business relationships are subjected to the same level of scrutiny as that of new contracts.

### **Key Performance Indicators to Measure Effectiveness of Steps Being Taken**

McDermott Developments Ltd are committed to undertaking due diligence on all potential clients and suppliers.

### **Training on Modern Slavery and Trafficking**

Awareness of modern slavery, bonded working and human trafficking will be raised throughout the business to help identify potential cases.

**Signed:**



**Date: 01 09 2023**

Seamus McDermott  
Director