

# **ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT**



**premierElectrics**



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## Version Control

Version	Action Taken	Primary Author	Date
1.0		Premier Electric	
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## **Opening Comments from the Managing Director**

Slavery and human trafficking remain a hidden blight on our global society. Premier Electrics fully acknowledges and accepts the responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

It is a requirement that all staff are fully aware of their obligation to report concerns, and management is expected to act upon them.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-slavery and human trafficking legislation. It is designed to assist the Company to comply with the Modern Slavery Act 2015 and to ensure that the Company's business is conducted in a socially responsible manner.

This policy covers any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## **Organisations Structure**

Premier Electrics is focused on delivering electrical fit-out and maintenance projects for clients in the retail, leisure, industrial and commercial sectors. We are a limited company based in Northern Ireland; we have successfully delivered an excess of 1000 projects throughout Northern Ireland, The Republic of Ireland, Mainland UK, and Europe.

Premier Electrics has an annual turnover of £40 million. Our business is organised into departments in the disciplines of Operations, Commercial, Estimating, Design, Finance & Administration which includes dedicated support for HR and IT functions .

## **Our Supply Chain**

A list of the organisations supply chain can be provided by the Financial Controller. The list of suppliers is subject to changes depending on the needs of the business.

## **Our policy of Human Trafficking and Modern Slavery**



Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

We are committed to eradicating modern slavery or human trafficking from our supply chains and business operations. This statement reflects our commitment to conducting business ethically and with integrity, while upholding the highest standards in all our business relationships. We implement and enforce effective systems and controls to prevent modern slavery and human trafficking within our supply chains. Additionally, we actively communicate our adherence to legislative requirements to our suppliers and service providers, fostering awareness and compliance across our network.

We will uphold all laws relevant to countering modern slavery in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Modern Slavery Act 2015 in respect of our conduct both at home and abroad.

Modern slavery is punishable for individuals by imprisonment and a fine. If we are found to have taken part, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### **Due diligence process on Modern Slavery and Human Trafficking**

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. This includes:

Evaluating modern slavery considerations when making procurement decisions.

- Developing awareness of modern slavery issues
- Encouraging suppliers and contractors to proactively address and comprehend their responsibilities under the new requirements.



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- Building long lasting relationships with local and international suppliers and customers, while clearly articulating our expectations for ethical business conduct.;
- Regarding national or international supply chains, we prioritise engagement with a UK/EU company or branch. We expect these entities to have appropriate anti-slavery and human trafficking policies and processes. Moreover, we expect each entity in the supply and delivery chain to, at least, adopt 'one-up' due diligence on the next link in the chain.
- Implementing a policy that outlines a structured process and designated contact person, to encourage the reporting of concerns and the protection of whistle blowers.

### **Supplier Adherence to Our Values**

We enforce high standards across our network of contractors, suppliers, and business partners. We explicitly prohibit the use of forced, compulsory, or trafficked labour, as well as any form of slavery or servitude, whether adults or children. We require our suppliers to uphold these standards throughout their own supply chains. Additionally, we maintain a zero-tolerance policy towards slavery and human trafficking, expecting full compliance from all entities within our supply and delivery chain, including subcontractors. The Senior Management team are responsible for ensuring adherence to these principles within their respective departments and supplier relationships.

A list of the organisations supply chain can be provided by the Financial Controller. The list of suppliers is subject to changes depending on the needs of the business.

### **Our Effectiveness in Combatting Modern Slavery and Human Trafficking**

We use the following key performance indicators (KPIs) on an ongoing basis to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply and delivery chains:

- Completion of House Audits by Area Managers and Business Development Managers;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

### **Your Responsibilities**

You must ensure that you read, understand, and comply with this policy.



The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or the Managing Director as soon as possible. Early reporting of concerns regarding modern slavery within our business or supply chains is encouraged, with procedures outlined in our Whistleblowing Policy.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you must raise it with your line manager or the Managing Director.

Genuine concerns raised under this policy will be supported, and no one will face detrimental treatment for reporting suspicions. If such treatment occurs, employees are urged to inform their line manager and utilise the Grievance Procedure.

### **How to Raise a Concern**

It is important that you tell the Managing Director or your line manager as soon as possible if you have any concerns regarding the supply chain or within the Company. If you suspect that this may happen in the future or believe that someone is victim of another form of unlawful activity, you must report this as soon as possible.

### **Training and Communication**

During the induction process all employees will be informed of this policy. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy.

Our zero-tolerance approach on slavery and human trafficking must be communicated to all suppliers, contractors, and business associates when the business relationship commences.

### **Monitoring and Review**

The Company will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any



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improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering modern slavery and human trafficking.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved.

### **Breaches of This Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

*Eamon M. O'Sullivan*

11-6-24