

	Human Rights, Anti-Slavery, and Human Trafficking Policy	Commercial P03	Issue No. 01
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Introduction

Glenveagh Properties PLC ('Glenveagh') is committed to trading ethically, with zero tolerance for modern slavery (including human rights violations, child and forced labour or human trafficking in any form), in our own operations and our supply chain.

This Glenveagh's Human Rights, Anti-Slavery, and Human Trafficking Policy Statement is published in support of and in conformance with the UN Universal Declaration of Human Rights. It sets out the steps taken by Glenveagh to prevent human trafficking and slavery in our business and supply chain.

Human Rights

We are committed to developing a culture that respects and supports human rights by establishing clear ethical standards for ourselves and encouraging similar standards in anyone who acts our behalf. We seek to use our influence to ensure that those in our supply chain are treated with fairness, dignity and respect.

Glenveagh has a responsibility to respect the human rights of our employees and we will endeavour to respect the human rights of all other persons working for us or on our behalf, our customers, and other stakeholders. We both expect and require all of our employees to engage with us to support the human rights of others and commit to the continuous improvement of our human rights performance.

Modern slavery, child labour, human trafficking

Glenveagh strictly prohibits the use of child labour, modern slavery, and human trafficking in our operations and supply chain, along with other abuses of human rights (as outlined in the European Convention on Human Rights).

Policy Application

This policy applies to all employees, contractors, suppliers, business partners and other third parties working on behalf of Glenveagh. We are committed to ensuring that there is no child labour or modern slavery in any part of our business or our supply chains.

Direct, Temporary and Agency Employment Practices

Glenveagh has procedures in place pertaining to our employment practices. We have robust recruitment processes in line with Republic of Ireland employment legislation including "right to work" document checks, and contracts of employment for all employees whilst also ensuring all applicable employment legislation (including any minimum wage requirements) are satisfied.

We use third-party labour agencies in limited circumstances/for the provision of temporary workers. We require all agency providers to satisfy us as to their compliance with all applicable legislation and to ensure that staff have written employment contracts, have not had to pay for the opportunity to work, and are legally permitted to work in Ireland.

Subcontractors

All new subcontractors are informed of our policy and procedures in relation to child labour and modern slavery, and revisions have been made to our Vendor Code of Conduct.

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Material Supply Chain

We are aware that materials that we procure and use on site may pass through jurisdictions where human rights violations occur, including modern slavery and child labour. These risks of human rights violations in our supply chains lie outside of our direct control.

To mitigate these risks, we set out in all new contracts the standards that we expect from all third parties that provide goods or services to us. As part of our on-boarding and contracting processes, we include a specific requirement to comply with our Vendor Code of Conduct including a prohibition against the use of modern slavery and trafficked.

Responsibility

Our Chief Executive Officer has overall responsibility for this policy. Group Department Heads are responsible for implementation of, and compliance with, this policy in their specific business area.

Whistleblowing

We aim to encourage openness and will support anyone who raises genuine concerns under this policy. The Company is committed to protecting the identity of the worker raising a concern and ensure that relevant disclosures are treated in confidence.

Employees, sub-contractors and suppliers who become aware of possible improper, unethical or illegal behaviour are encouraged to raise the matter with their manager. Individuals can also refer to the Whistleblowing Policy for guidance on reporting concerns.

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 are found to be in breach of this policy.

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



Chief Executive Officer

15/02/2021

Date