

Keltbray is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chain, including subcontractors, and partners. The company acknowledges its responsibility under the Modern Slavery Act 2015 (the Act) and will ensure transparency within the organisation and with approved suppliers of goods and services to the organisation who make up the supply chain for Keltbray.

This Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

As part of the company's due diligence processes to identify, assess, monitor and mitigate potential risk areas in our supply chains, since 2016 the supplier approval process has incorporated a review of the controls undertaken by the supplier. All businesses that the company deals with are required to confirm that both they and their supply chain are not knowingly involved in slavery and human trafficking. Such a declaration is required by all companies in order to be added to the company's preferred supplier list. The company will not support or deal with any business knowingly involved in slavery or human trafficking. The company is also aware that a substantial amount of its agency labour is of eastern European origin. In the past all agencies have been required to confirm on an annual basis that they are not involved in slavery or human trafficking. Going forwards, agencies shall be subject to audit by Keltbray to confirm that no modern slavery is being undertaken. The Company Directors and Senior Management take responsibility for implementing this policy statement and its objectives and provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains. Over the past year, the company has audited a number of businesses in the company's supply chain to ensure that they are complying with the Act. Auditing of the company's supply chain will continue on an ongoing basis.

A full copy of this policy will be accessible to all employees electronically and a copy of the Act can be obtained from the HR / HSQE Department upon request.

This policy takes into account, and supports, the policies, procedures and requirements documented in our Management System(s). It is compliant with the requirements of ISO 9001, ISO 14001 and OHSAS 18001. The implementation and operation of our Management System(s) underlines our commitment to this policy. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continued suitability and relevance to the company activities.

This policy statement will be reviewed annually, published and be briefed to all employees during induction and each time it is reviewed.



John Keehan
Group Deputy CEO

Date: July 2018