



## Organisational information

Kane Group Management recognises our role under the principles of The Modern Slavery Act to reduce forced labour, human trafficking and other hidden third-party labour exploitation. We are committed to working with others to take proactive measures to identify and mitigate the risks of slavery and human trafficking in our supply chain.

Kane Group operates as a Mechanical and Electrical Services company in the Construction sector, with supply chains providing us with both workers and materials. In the interests of the human rights of others, and to avoid reputational damage, we conduct verification checks on our supply chains to rule out trafficking or modern slavery.

## Kane internal due diligence to reduce the risk

- Our Site Managers and our Recruitment Teams are trained to spot the signs of modern slavery and given guidance on how to report, if found:
  - instances of lack of freedom among workers, threats of violence or harassment, isolation, or examples of compulsory overtime, withholding of wages, or debt bondage
- We have a Whistle-blowing policy in place to allow for confidential and anonymous reporting of suspicions, without fear of recrimination
- Our directors are aware of the steps to take to report to the Home Office and how to offer support to victims of modern slavery
- We take proactive steps to build strategic partnerships with businesses in our supply chain including having:
  - Regular progress review meetings
  - Open and transparent costing
  - Effective joint labour planning to avoid last minute changes in worker requirements
  - Reviewing workers' experiences of our recruitment or employment procedures.
- We have signed up to Stronger Together and use their Toolkit for Tackling Modern Slavery in the Construction Sector.

Since March 2024, we have found no instances of modern slavery in our supply chains.

## Supply chains

We mostly use Bona fide sub-contractors with whom we have built up a strong working relationship over the years, and who have been approved by us after having completed our Sub-Contractor PPQ.

The PPQ includes a reference to the Modern Slavery Act:

<b>1. Under the principles of the Modern Slavery Act 2015, can you guarantee that none of your workforce, or sub-contracted employees, are currently, or will ever be, the subject of slavery or human trafficking?</b>	<b>Yes / No</b>
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We then include appropriate terms in our contractual documentation - standard terms and conditions and supplier code of conduct - which require third party Subcontractors to comply with the Modern Slavery Act 2015 and the Bribery Act 2010:

“The Sub-subcontractor shall adhere to all legal requirements to protect workers from exploitation and shall have suitable anti-slavery and human trafficking policies and processes within their businesses in accordance with the Modern Slavery act 2015 and the Bribery Act 2010.”

## Labour Only Sub-contractors

We recognise that through employing Labour Only Sub-contractors we may be exposed to the risk of allowing illegal workers on to our site. Therefore, we carry out the following due diligence processes to mitigate the risk.

Before we authorise their services, our Labour and Resources Team carries out the following checks to ensure they operate as a legitimate business –

- That they are appropriately registered and licensed
- They have adequate insurance cover in place
- They have the resources to carry out the work
- That there are no legal proceedings against them – especially for abuse of human rights or trafficking

After completing the PPQ, and when we have carried out business credibility checks, these contractors sign a contract which includes the following statement:

“In compliance with the Modern Slavery Act 2015, Kane Group expects all workers on our sites to legitimately have the right to work in the UK. By signing this contract, you are stating that both you, and the workers you send to site, are legally employed in the UK.”

## Suppliers of plant and materials

We operate a system of approved and preferred suppliers.

We have built up strong relationships with our main suppliers of plant and materials over the past number of years and our Procurement Teams hold regular review meetings with them to strengthen that relationship.

Suppliers are made aware of our Ethical Sourcing Policy Statement: (Extracts)

- 1 “Kane Group are involved in the purchase of goods and services to support the delivery of our business activities. We aim to be responsible for delivering value to our clients, whilst observing purchasing practices that align with our corporate social responsibility aims and objectives.”
- 2 We will ensure integrity in all our business transactions. We will be open, honest & fair in our communications and our dealings with business partners and other stakeholders affected by our activities and where necessary that of our supply chain. The company operate strict codes of conduct regarding acceptance of bribery or gifts made in the conduct of our business (see the Company's anti-bribery & corruption policy).
- 3 “We are committed to the promotion of ethical working conditions including fair wage, working hours and equal opportunities.  
  
We will respect the principles of human rights, to treat employees with dignity and respect and to ensure that no child labour is employed.”

Where we use timber products ( very limited use) we ask for the FSC certificate of the source of the timber to uphold the UN Sustainability goals and try to eliminate unscrupulous abuse of human rights and/or resources.

## Recruitment

- Our job description is accurate and transparent
- Our Human resources Team check that potential appointees are eligible to work legitimately in the UK – with current photographic I.D -passport and a work VISA - if they are non-resident.
- They also check that no recruitment fees must be paid to another (possible gangmaster)
- They check addresses of workers are legitimate and not houses of multiple occupation
- Our Site Management ensures there are no underage workers on site and that every worker clocks in through facial recognition
- Wages and benefits are paid fairly - and always into the employee's own bank account
- We abide by Working Time Regulations and ensure that our Sub-contractors also abide by them
- We ensure working conditions are safe and hygienic

- Where we provide accommodation, we ensure it is clean and hygienic
- All workers are properly recruited, inducted, onboarded and given equal access to training relevant to their job.
- There are equal opportunities for progression and promotion in our company
- Our business conduct is professional and ethical.
- That they sign up to a declaration in the contract stating their commitment to the obligations of the Modern Slavery Act and that their employees have the Right to Work in the UK.

Signed:

A handwritten signature in black ink, appearing to read 'C. McMullan', written in a cursive style.

Cathal McMullan

Managing Director, Kane Group

Date: 27<sup>th</sup> March 2025