

# Modern Slavery and Human Trafficking Policy

Revision 3  
May 2025

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**Table of Contents**

1.0 Purpose..... 2

2.0 Due Diligence..... 2

3.0 Processes..... 2

4.0 Responsibility ..... 3

## 1.0 Purpose

Suir Engineering is a leading provider of innovative mechanical, electrical and instrumentation engineering solutions for our clients throughout Ireland, the UK, Europe, and other locations across the globe. We provide best in class contracting solutions with in-house, flexible resources capable of providing a personable and consistent service to our customers. We successfully do this through our employees, sub-contractors, and our equipment suppliers.

The purpose of this Policy is to clearly outline what processes, procedures and policies are in place throughout Suir Engineering, which help to eradicate the potential for Modern Slavery and Human Trafficking. This Policy also outlines who is responsible within the company, for the management of our Modern Slavery and Human Trafficking Policy, and also who makes the changes to this Policy accordingly, if there are any legal changes required.

## 2.0 Due Diligence

Suir Engineering acknowledges its responsibilities under the Modern Slavery Act 2015 and will ensure transparency within the business and with suppliers of goods and services and all those who make up the supply chain within Suir Engineering. Suir Engineering will ensure that our supply chain procedures are rigorous and will again ensure that our policies are in line with legislation to eradicate the potential for Modern Slavery and Human Trafficking.

The success of this Policy Statement is dependent upon all employees, supply chains and subcontractors playing an important part in helping to detect and eradicate slavery. As such, all individuals are encouraged to report any suspected slavery to our “Speak Up” email [suas@suireng.ie](mailto:suas@suireng.ie), the details of which can be found within our Whistleblowing Policy.

## 3.0 Processes

We have in place a number of robust processes which ensure that our staff and supply chain are treated in an ethical and lawful manner. These are delivered through our Integrated Management System and go beyond the minimum standard required by legal compliance.

These processes include:

- Whistleblowing Policy.
- Employment policies including:

## IMSCP-HR-18 Modern Slavery and Human Trafficking Policy

- Recruitment processes for carrying out checks on the right to work in the UK, Ireland, and the EU.
- Up-to-date employment contracts which comply with UK, EU, and Irish labour laws, for example, in respect of the national minimum wage, making deductions from wages, notice periods and working time.
- Equal Opportunities Policy.
- Diversity and Inclusion policy.
- Grievance procedures.
- Our Employee Code of Conduct setting out our corporate values.
- Corporate Social Responsibility Policies, including Health and Safety and Environmental Sustainability policies.
- Training and competence programmes for employees and sub-contractors, including ensuring our employees and sub-contractors have the minimum levels of qualifications required to deliver our contracts.
- Governance and compliance processes based on internal and external audits.
- Our Supplier Code of Conduct, which applies to all our suppliers/sub-contractors across the business.  
This requires:
  - Freely chosen employment and no form of forced labour.
  - Child Labour Avoidance.
  - Working hours that do not exceed applicable legal limits.

### 4.0 Responsibility

The Suir Engineering HR Department, led by the HR Director and the Compliance and Insurance Manager, are responsible for this Policy. They are responsible for implementing the Policy, bringing it to the attention of all employees and key partners, sub-contractors, and suppliers and for the maintenance of associated documentation and programmes. The Policy will be available on the company portals (Sage & the IMS) and the company website.

This Policy will be regularly monitored and reviewed.

## Document Control Sheet

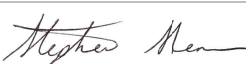

### DISTRIBUTION:

	Distribute to:
1.	All Staff

### DOCUMENT PREPARATION AND REVIEW (Revision 1)

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Reviewed by	Claire Cusack	HR Director	Claire Cusack	03/07/23
Approved by	John Kelly	CEO	John Kelly	21/07/23

### DOCUMENT REVISION HISTORY

Revision	C.M. No.	Description	Reviewed by	Approved By	Date
0	N/A	Introduction of Slavery & Human Trafficking Policy	N/A	Mick Kennedy	Feb. 2021
1	44	Update of our original Slavery and Human Trafficking Policy. Inputted into updated template.	Claire Cusack	John Kelly	21/07/23
2	236	Rectify discrepancy in Rev. No. history	Stephen Herron	Claire Cusack	07/10/24
3	288	Brand Refresh. No review to content.		 <small>Claire Cusack Jun 3, 2025 14:58 GMT+1</small>	03/06/25