

# Modern Slavery and Human Trafficking Policy

**This policy statement sets Coreus Group and its subsidiary 'Coreus Projects Limited' commitment to preventing modern slavery and human trafficking in our business with the aim of ensuring there is no slavery or human trafficking in our own business and supply chains.**

## Our Policy

Coreus is committed to operating all business activities to the highest standards of business ethics and integrity.

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.

Coreus has a zero-tolerance approach to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our suppliers.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we will continue to review our supply chain to identify and assess potential risk areas.

We are committed to ensuring that all our employees receive appropriate training and expect our suppliers and other partners to ensure the same is provided for their employees. We expect high standards from all of our subcontractors, suppliers and other business partners and have made this a contractual term in our agreements with significant suppliers wherever possible.

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, 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.

## Our Organisational Structure

Coreus provides cost, management, development and sustainability advice to clients nationwide. Our clients include public and private companies across all industry disciplines, offices, education, healthcare, offices etc.

## Our Supply Chains

We would consider our supply chains to be large and complex when looking at each facet of our business and service offering. In order to ensure a robust procedure for review and assessment of current and new suppliers, we will look at each operation on its own as well as the combine operations for which we jointly procure services such as IT, waste disposal, catering equipment, stationary etc.

In order to recognise our risks, we have outlined our operations where potential risks could be found.

Consulting – responsible for cost, environment and project management, working with and advising clients and design teams. Generally, we would oversee and advise on procurement of services such as architecture, ecology, building services etc. The cost and project managers would also oversee the procurement of not only services but also specifications to meet client requirements. We would consider this operation of low risk in respect of modern slavery and human trafficking.

Developing – Responsible for procuring and managing a diverse supply chain including professional teams, contractors and in some instance’s operators. We would consider these operations of higher risk in respect of modern slavery and human trafficking.

Constructing – Responsible for managing contractors and suppliers of materials and labour in the supply chain and the on-site workforce. We would consider these operations of higher risk in respect to modern slavery and human trafficking.

We would consider our primary risk area to be within our future construction operation relating to construction delivery. It will be a priority to ensure robust systems are in place prior to the commencement of these activities in order to achieve transparency of labour employment arrangements and sourcing of key materials within our supply chain.

### **Supplier Adherence to our policy**

We are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- Ensure that our supply chain are aware and adhere to the relevant government legislation.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our policy, which sets out the minimum standards required to combat modern slavery and trafficking.

- Consistent with our risk-based approach we may require employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policy
- Suppliers engaging workers through a third party to obtain that third parties' agreement and confirm that they adhere to our policy.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policy.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from terminating the relationship to looking at options of remediating the breaches to ensure the best possible outcome for those individuals impacted.

### **Responsibility for the Policy**

The management of the company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all our people comply with it.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Monitor potential risk areas in our supply chains.
- Encourage whistleblowing and protect whistle-blowers.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all our staff at least once a year and feedback any changes or updates to our monitoring systems. We also require our business partners to provide training to their staff and suppliers and providers.

### **Breaches of this Policy**

Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct in line with the employee contract.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **Performance Indicators**

We will measure how effective we are at ensuring modern slavery and human trafficking is not taking place in any part of business or supply chains through regular audits and reviews.

We will undertake right to work checks on all our prospective employees prior to entering into contract. All right to work documentation will be stored on the individuals personal file.

Our policy will be regularly reviewed and updated as necessary as our business evolves and our operations are updated. Our management endorse this policy and is fully commitment to implementation across our company and our supply chain.

**This policy has been signed off by our Managing Director for the years 2023 and 2024.**



**Andrew Clancy**  
**Managing Director**  
**September 2023**