MODERN SLAVERY STATEMENT

Modern Slavery Statement for Financial Year 2017/18
This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Bennett Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Bennett Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business
We are an international family owned construction services company with offices and projects in Dublin, London and Germany.

Our High Risk Areas
The following activities are considered to be at risk of modern slavery within the Bennett Group and the list will be reviewed and updated from time to time:

- Use of staff by subcontractors or suppliers to Bennett, where the suppliers’ processes are not compliant
- Employment of sub consultants, suppliers and sub-contractors by Bennett, where their work practices may be non-compliant

Our Policies
We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Equal Opportunities Policy: We are fully committed to ensuring that equal opportunities policies are implemented and maintained. All terms and conditions of service apply on a fair and consistent basis to every member of staff.
- Recruitment Policy. We operate a robust recruitment policy, including conducting checks on work eligibility for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Code of Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- Corporate Social Responsibility Policy: Bennett has long practiced strong corporate governance guidelines and we continue to advocate corporate responsibility in every facet of our business on a daily basis.

Our Subcontractors & Suppliers
Bennett operates a supplier policy and maintains a preferred subcontractor/supplier list. To ensure all those in our supply chain and subcontractors comply with our values we conduct due diligence on all subcontractors and suppliers before allowing them to become a preferred supplier.

Our anti-slavery policy forms part of our contract with all subcontractors/suppliers and they are required to confirm that no part of their business operations contradicts this policy.

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers who share our values.

Training
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our
supply chains, we intend to roll out a training programme to our staff. All staff will be encouraged to attend training in this area to better understand the risks.

**Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.