

MODERN DAY SLAVERY POLICY STATEMENT

ABOUT GALOSTAR

Since being formed in November 1994 Galostar Ltd has grown into an established leading brick, blockwork and masonry contractor offering a multi-disciplined package to all major main contractors across the United Kingdom. Having been part of many prestigious developments, including such projects as Victoria Street in Stratford, East London - a development of houses, flats, sheltered housing and offices moving on to major roles in some of the UK's leading developments such as the Olympic Stadium and more recently on the Crossrail Projects in Central London with shopping malls, health centres and school academies further afield in the Home Counties and Scotland. Galostar Ltd continues to grow, proud of its achievements and enthusiastic about its future continuing to operate in all sectors of the construction industry.

MODERN SLAVERY

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.

Galostar, in accordance with current legislation, has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. **Having assessed our business with regards to modern day slavery we believe the area with highest risk is labour.**

This policy does not form part of any employee's contract of employment and we may amend it at any time.

RESPONSIBILITY FOR THE POLICY

Galostar has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Galostar has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. We conduct regular toolbox tasks on modern slavery. We also train our Supervisors and Project Managers to identify signs of modern slavery.

Our process of due diligence is in the first instance that all our labour is registered and vetted by Hudson our payroll and labour agency. Hudson complete all the relevant legal checks and vetting before submitting candidates to us. In house checks are also completed during the induction process.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director OR report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the current employee handbook.

KPI's

- Deliver an internal awareness campaign throughout UK operations to all employees regarding modern slavery.
 - Ensure that 100% employees are exposed to modern slavery awareness raising; how to spot the signs; how to report it; and Galostar's response to modern slavery
 - Ensure that 100% of all inductions for labour include modern slavery awareness
 - Increase the number of modern slavery ambassadors within the business by 100% in 2022
- Ensure that all employees directly involved in supply chain management and procurement receive Modern Slavery Training as well as on-going updates and notifications regarding business and human rights, specifically modern slavery.
- Galostar are in the process of implementing a supplier communication and verification programme which confirms that suppliers have received and understood Galostar's position regarding modern slavery and are aware of Galostar's Modern Slavery Policy
 - Implement roll-out of supplier communication and verification platform to ensure that 95% of supplier have confirmed acceptance of Galostar's Supplier Code of Conduct, including Modern Slavery.
 - Develop supplier education partnerships with 50% of those identified as high risk through our modern slavery risk mapping activity.
 - Engage in proactive modern slavery education programmes with those suppliers who have raised issues or concerns.
- Report on our effectiveness in helping to ensure that slavery and human trafficking is not taking place in our business or supply chains including the due diligence process outlined in Galostar's Modern Slavery Policy



- Number of reported instances of modern slavery within our business operations and supply chain by country/supply chain.
- Number of pieces of intelligence shared with law enforcement, Gangmasters Labour Abuse Authority, Hope for Justice.
- Number of instances of modern slavery identified as a result of intelligence shared with law enforcement, Gangmasters Labour Abuse Authority, Hope for Justice.
- Number of effective partnerships & collaborations with the sole aim of preventing modern slavery in our business operations and supply chains.
- Further development of the organisations supply chain due diligence, related human rights programme, external ethical auditing and modern slavery risk mapping processes in order that instances of modern slavery can be identified, remedial action undertaken, and the victims supported and that all of this is transparently reported.
 - Publish supply chain modern slavery risk mapping for 50% of the supply chain identified as high risk.
 - Action an external ethical auditing and modern slavery risk mapping programme which cover 30% of supply chain identified as high risk.
- Develop, in line with current legislation, a process of remediation and support for victims of modern slavery identified within the organisation's operations and supply chains.
 - Have in place a process of remediation and support for 50% of supply chain identified as high risk by volume of product.

COMMUNICATION & AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

You must notify your line manager OR a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Signed 

Dave Mountney- Labour Manager