	Document No:	IMSPS5
	Primary Author:	C Doherty
	Authorised by:	P Dunlop
DOCUMENT TITLE MODERN SLAVERY POLICY	Issue Date:	22 March 2024
	Issue No:	6
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1 POLICY STATEMENT

1.1 This statement applies to Causeway Geotech Limited (referred to in this statement as ‘the Organisation’).

2 ORGANISATIONAL STRUCTURE

2.1 Causeway Geotech Limited operates across Northern Ireland, Great Britain and the Republic of Ireland from its Ballymoney Head Office and other office in Balbriggan, Co. Dublin.

2.2 The main activity carried out by the organisation is the provision of Specialist Geotechnical and Site Investigation services. This is undertaken both at our offices, and at Client’s sites. Demand for our services is consistently high throughout the year.

2.3 The labour supplied to the organisation is in pursuance of its operations carried out in Northern Ireland, Great Britain and the Republic of Ireland.


3 DEFINITIONS

3.1 The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.


4 COMMITMENT

4.1 The organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015 (UK) and Criminal law (Human Trafficking) (Amendment) 2013 (ROI). Causeway Geotech Limited understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

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4.2 Causeway Geotech Limited does not enter into business with any other organisation, in the United Kingdom, Ireland or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

4.3 No labour provided to Causeway Geotech Limited in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in Northern Ireland, Great Britain and the Republic of Ireland.

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5 SUPPLY CHAINS

5.1 In order to fulfil its activities, Causeway Geotech Limited main supply chains include those related to the supply of goods and services, in relation to site investigation and geotechnical testing, from various suppliers in both the United Kingdom and Republic of Ireland. We understand that Causeway Geotech Limited's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

6 POTENTIAL EXPOSURE

6.1 The organisation considers its main exposure to the risk of slavery and human trafficking to exist in the provision of sub-contracted services where labour is included.

6.2 In general, the organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

7 STEPS


7.1 The organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

7.2 The organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

7.3 In accordance with section 54(4) of the Modern Slavery Act 2015, the organisation has taken the following steps to ensure that modern slavery is not taking place:

- Currently undertaking a review of Supplier approval procedures.
- Currently reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery.

7.4 The company will include the topic of Modern Slavery at induction stage for awareness on this topic to employees. Additionally the company has sourced e-learning courses on Modern Slavery for HR and line management staff to undergo for improved awareness.

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8 KEY PERFORMANCE INDICATORS


8.1 The organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the organisation, or its supply chains:

- Zero instances / suspicions of slavery within supply chain.

9 SLAVERY COMPLIANCE OFFICER

9.1 The organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the organisation's obligations in this regard.

9.2 This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015, will be communicated to all interested parties as required and reviewed for each financial year.

Signed:	
Name and Position:	Ciaran Doherty Director