



ANTI-SLAVERY POLICY

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a gross 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.
- 1.2 Flynn Group has a zero-tolerance approach to modern slavery and we are committed 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.
- 1.3 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, suppliers or any other people or bodies associated with the business.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal obligations, and that all those under our control comply with it.
- 2.2 The Anti-Slavery Compliance Team (the 'Compliance Team') which comprises the Group Managing Director, HR Advisor and Deputy Group Company Secretary will work together to ensure that this policy is maintained across all operational areas of the Group in accordance with evolving regulatory requirements and to ensure that any breaches or concerns are addressed.
- 2.3 The Group Managing Director has primary and day-to-day responsibility in relation to our supply chain for implementing this policy and 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.
- 2.4 The HR Advisor has primary and day-to-day responsibility in relation to those directly employed by us for implementing this policy and 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.



3. COMPLIANCE WITH THE POLICY

- 3.1 All persons working for Flynn Group must ensure that they read, understand and comply with this policy.
- 3.2 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. All persons working for Flynn Group are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 All persons working for Flynn Group 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 at the earliest possible stage, by reporting it in accordance with our Whistleblowing Procedure. All workers are assured that they will not suffer any adverse consequences for reporting genuine concerns over suspected business wrongdoing.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 This policy will be communicated to all Flynn Group employees.
- 4.2 Flynn Group employees are required to communicate our zero-tolerance approach to modern slavery to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforce our approach as appropriate thereafter.

5. DUE DILIGENCE

- 5.1 In order to give effect to our zero-tolerance approach, we have systems in place to ensure that all employees and those in our supply chain implement our policy. These will be kept under review by the Compliance Team.

6. BREACHES OF THIS POLICY

- 6.1 Any breach of this policy will generally be treated as gross misconduct and may result in dismissal without notice.
- 6.2 We may terminate our relationship with individuals and organisations working on our behalf if they do not comply with this policy.

This policy has been approved by the Board of Directors of John O'Flynn Developments Limited

Signed:

Title: Managing Director

Date: 24.1.19

January 2019