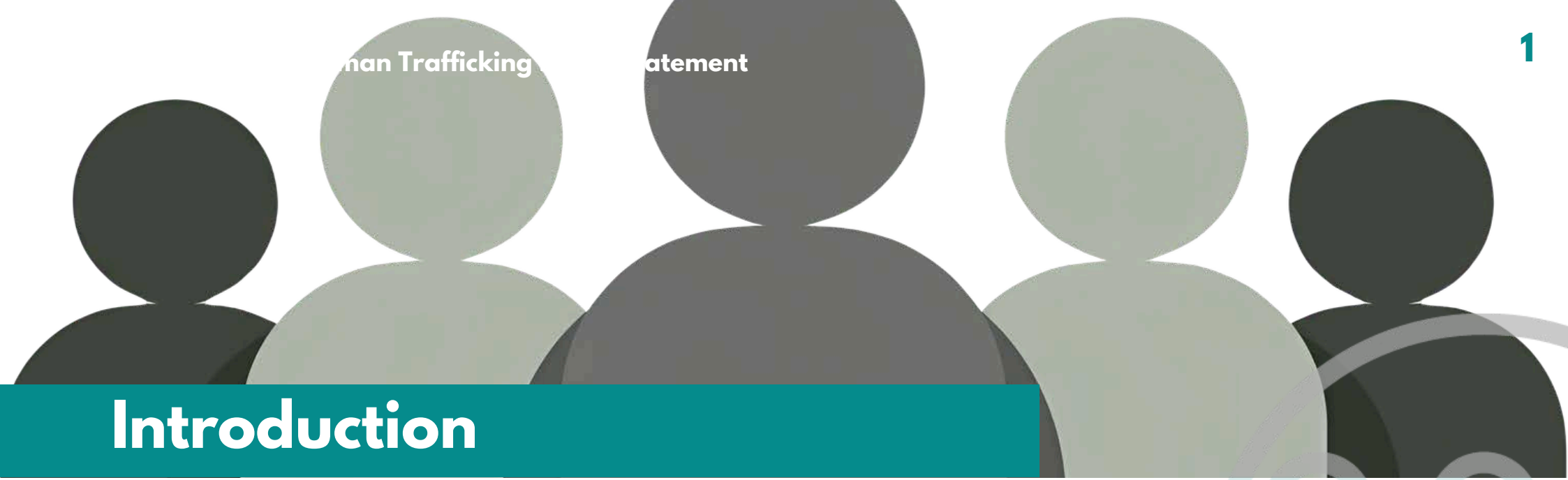
Anti-Slavery & Human Trafficking Policy Statement



Killowen Contracts Ltd
Building, Civil Engineering and Fitout Contractors

killowencontracts.co.uk



Introduction

ensuring that modern slavery or human trafficking is not taking place within our business or supply chain

Killowen Contracts Ltd is a Building, Civil Engineering & Fit-Out Contractor operating throughout Northern Ireland and Ireland undertaking work for both public and private sector clients.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that Killowen Contracts Ltd has taken and is continuing to take to achieve our target of ensuring that modern slavery or human trafficking is not taking place within our business or supply chain.

The Act creates offences in respect of slavery, servitude, forced or compulsory labour, and human trafficking ("Modern Slavery"). It also requires certain businesses to provide disclosure concerning their efforts to address the prevention of slavery and human trafficking in their supply chains. These disclosures are intended to provide clients the ability to make better informed decisions about the services they buy and companies they support.

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Structure & Supply Chain

working in partnership

We believe that working in partnership with our clients, community, stakeholders and supply chain in a sustainable way enables us to find more practical and safer methods of ethical trading free from slavery and human trafficking.

Killowen Contracts Ltd is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and those of our supply chain.

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Policies & Procedures

operating in an ethical and transparent manner

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-bribery policy
- Anti-slavery and Human Trafficking Policy
- Recruitment policy
- Whistleblowing policy

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Due Diligence

on all suppliers before becoming a preferred supplier

Killowen Contracts Ltd operates a preferred supplier database and conducts due diligence on all suppliers before allowing them to become a preferred supplier.

Our Anti-slavery Policy and compliance with the Act, forms part of our contract with all suppliers and subcontractors, and they are required to confirm Right To Work provisions, and that no part of their business operations contradicts our policy or breaches the Act.

We will only trade with those who fully comply with this policy and may terminate the contract at any time should any instances of slavery and human trafficking become apparent.

Suppliers and subcontractors are required to notify Killowen Contracts Ltd as soon as they become aware of any instance of modern slavery or human trafficking taking place in their business or their own supply chain.

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Risk Assessment

focussed audits

Killowen Contracts Ltd reviewed our business risk assessment and acknowledged that, with the majority of our work subcontracted to specialists from our preferred supply chain, the most significant risks remain here, and therefore this is where our audits were focussed.

These audits were clear during this financial year.



Measuring Effectiveness

regular documented audits

Killowen Contracts Ltd in-house Safety, Health & Environment Team conduct operations - independent, regular documented, audits of our projects to identify if common markers of Modern Slavery exist, and to safeguard against it taking place within the business or our supply chain. During this financial year these audits were clear.

Our Internal Audit Team also conduct reviews of our policies and procedures to measure compliance with them and effectiveness of them. During this financial year there were no non-conformances raised.



Training for staff

understanding signs and taking action

Killowen Contracts Ltd regularly provides information, tool-box talks, and awareness training so that staff understand the signs of slavery and human trafficking and know the action to take if they suspect that it could be occurring.

We provide links to **Stronger Together** and **UK Government Modern Slavery**, and display the Stronger Together Multi-language Worker Leaflet Poster on sites.

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This statement constitutes the Killowen Contracts Ltd Slavery and Human Trafficking Statement for the financial year ending 31 March 2025.

It has been approved by our Board of Directors, who will review and update it as necessary on an annual basis.

Policy document signed: Mr Brian McGivern
Position: Managing Director | Date: 1st January 2026



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