



## **Modern Slavery and Anti-Corruption Policy**

1. Eiran Civil Engineering Ltd (ECEL) provides services to Construction and Utility Companies throughout Wales, Ireland, Northern Ireland and England.
2. ECEL is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.
3. ECEL adopts zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.
4. We fully support the government's objectives to eradicate modern slavery and human trafficking.
5. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

### **Statement introduction**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

1. This is our inaugural annual statement.
2. We continue to engage with a large number of private and public-sector organisations in pursuit of our Contracting, Employment, Investment and procurement procedures.
3. Our activities are usually undertaken within Wales and England. Our investment model is to support contracting and economic growth using Delivery Partners and Direct Employees.
4. We occasionally undertake activities by partnering with local utility companies and developers within a special purpose or joint venture partnership organisation; and where appropriate we will undertake direct development using Delivery Partners or construction companies procured for that purpose.
5. Management responsibility and general awareness. Responsibility for the preparation and publication of this policy resides with our General Counsel, Legal Services.

We have:

- Reported progress to our Executive Management Team and our Board.
- Reconfirmed management responsibility for this policy and statement and received unanimous endorsement from our Executive Management Team and our Board.
- Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.



### **Risk assessment**

We have:

Created this policy and statement about our activities to establish whether the approach we have taken follows emerging best practice by:

- Assessing and interpreting any recent or emerging case law and best practice;
- and
- Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.
- Undertaken a second risk assessment using our professional legal, risk, procurement and regulation teams to determine our risk exposure.
- Reconfirmed that our primary risk is an association with a Delivery Partner, Framework participant or company with an ambiguous or non-compliant supply chain.

### **Additional risk mitigation**

We have:

- Introduced new processes and procedures in relation to procurement and due diligence, as outlined.
- Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

### **Expectation and encouragement**

We expect all Delivery Partners, organisations within our Frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains:

Fully comply with the Modern Slavery Act 2015; and are Transparent, accountable and auditable; and are Free from ethical ambiguities.

We encourage Delivery Partners and organisations within our Frameworks and other companies we engage in within construction, land and real estate, to read and apply as appropriate 'Advancing Responsible Business Practices in Land, Construction and Real Estate Use and Investment', a joint publication between the United Nations Global Compact and the RICS.

Date: 11/01/2022

Name: Anita Lane Mark Lane

Position: Directors

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Review 12 months at Management Review or after any significant change or influence. No requirement for updated version if no changes.