


HRP20 Kirby Modern Anti-Slavery Statement

Adopted:	13 th September 2018
Contact Officer:	Fergus Barry
Last Amended/Reviewed:	23.08.2024
Version/Reviewed by:	Rev 0. 23 August 2024 – by Fergus Barry – HR Director
Next Formal Policy Review:	Every Year
Formal Review of Policy by:	Fergus Barry
Policy Links:	This policy links to all policies, procedures and strategy documents adopted by Kirby Group Engineering.
Policy signed into effect by:	

Modern Anti-Slavery Statement

Founded in 1964, Kirby Group Engineering is a leading provider of high-value, multi-disciplinary engineering/contracting services. Our headquarters are situated in Co. Limerick, Ireland and the company operates in Ireland, the UK and Continental Europe. We deliver a range of services including mechanical piping, HVAC, electrical and instrumentation, power transmission and distribution (electrical and civil works) and turnkey solutions. We serve clients in the industrial manufacturing, life sciences, mission critical, utilities and renewables, power generation and petrochemical sectors.

This statement on modern anti-slavery and human rights is issued in compliance with the Modern Slavery Act 2015, which is intended to tackle modern slavery and includes a provision for transparency in supply chains.

Kirby Group Engineering is committed to ensuring to the best of its abilities that neither modern slavery nor human trafficking occur within the company or our supply chain. Our approach is highlighted in the "Kirby Business Integrity Policy" under the following sections and applies to all Kirby management, employees and our supply chain:

- "Slavery and Human Trafficking"
- "Employment Practice and Human Rights"

We have a zero tolerance approach to slavery and human trafficking. Our HR policies and recruitment processes ensure only those entitled to work in the jurisdiction are employed and all original documentation is checked against jurisdictional requirements. Our HR policies ensure a progressive employment regime and allows freedom of association and guarantees that every employee receives directly at a very minimum the fair wage for a normal weeks' work. Individual's working hours are also carefully managed and reviewed to ensure that they meet the requirements of the Organisation of Working Time Directives. The Group Head of Human Resources verifies and certifies this annually.

Our aim is to maximise our suppliers' compliance through our Business Integrity Policy. In 2015, Kirby communicated the key principles of our Business Integrity Policy to our suppliers through a compliance letter. Compliance with these principles is further enforced by adding the relevant clauses to our "MF7.1 – Request to Add Supplier" form, as well as specific contract terms and conditions, which all of our subcontractors that we work with sign up to. All suppliers must certify that they meet our ethics and labour requirements (including anti-slavery and trafficking) and there are periodic audits by Kirby to ensure that appropriate records are in place to ensure compliance and positive labour practice.

Kirby will refrain from doing business with any supplier found to be in breach of our Business Integrity Policy clauses. Our Business Integrity Policy also includes Whistleblowing Charter, which ensures that there is a policy in place which allows employees to confidentially raise any concerns over forced labour, slavery or human trafficking.

Our ethical approach is also covered in Kirby Corporate SR Policy under "Ensuring Ethical Business Practices", which is updated and communicated annually.

This statement has been reviewed, approved and signed off by Kirby's Board of Directors. It has been published on our Website and Intranet site and will be reviewed and updated annually.