

Introduction

Modern slavery is a crime and a 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.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in the UK and constitutes the NOONAN slavery and human trafficking statement for the financial year ending 31 December 2016.

Anti- slavery, human trafficking, forced and bonded labour Statement

NOONAN is an ethical and equal opportunities employer, committed to operating in accordance with current best practice and limiting any potential for labour rights violations within its operations. As an 'Investors In People' accredited organisation, NOONAN facilitates continuous improvement within its Human Resources department. NOONAN are also committed to all policies contained with the Base Code of the Ethical Trading Initiative.

As a provider of strategic outsourcing solutions, people are NOONAN's key asset. With many of NOONAN's employees operating in the cleaning and security sectors, the company acknowledges a medium-level risk to its operational staff in terms of labour and rights violations; as such, NOONAN takes all possible steps to mitigate these risks and ensure compliance to all legislative acts and guidelines.

Legislative Guidelines

The legislative guidelines incorporated into all aspects of NOONAN's activities are as follows:

Ireland

- The Employment Equality Act 1998 came into force on the 18th October 1999, and was amended on the 25th October 2004 by the Equality Act 2004.
- The Employment Equality Acts 1998 and 2004, deal with discrimination within employment.

Northern Ireland

NOONAN operates in line with British Standard BS7858.

- The Race Relation (NI) Order 1997
- The Sex Discrimination (NI) order 1988 and the Equal Pay Northern Ireland 1970
- The Disability Discrimination (NI) Order 2006
- The Fair Employment and Treatment (NI) Order 1998
- The Employment and Equality (Age) Regulations (NI) 2006
- The Employment Equality (Sexual Orientations) Regulations (NI) 2003.

United Kingdom

- Equality Act 2010
- Modern Slavery Act 2015

OUR VALUES

Professionalism Respect Innovation Determination Excellence

Procurement

NOONAN takes steps to ensure that its supply chain is held up to the same high standards as NOONAN itself. In the first instance, this means only working with subcontractors who can prove their own rigorous recruitment procedures and commitment to laws and legislative guidelines.

NOONAN's Procurement department is further committed to mitigating any risk of labour rights violations within the supply chain. A procurement process was recently conducted to rationalise NOONAN's supplier list, thereby ensuring increased visibility and awareness of its suppliers' operations.

Specific Process

Effective procurement procedures are key to NOONAN's success in mitigating the risk of modern slavery and bonded labour within its supply chain. Internal training courses and employee tool box talks have been designed in order to fully equip managers, supervisors, team leaders and HR professionals with the necessary skills to spot the signs of modern slavery.

NOONAN implements the following key processes at the procurement stage:

Interviews must be conducted and questionnaires completed to ensure potential suppliers carry out the following recruitment techniques:

- All applicants have been interviewed to ensure that they have filled all registration forms themselves
- Applicants can only be interviewed at an approved location
- Unauthorised agents or individuals will not be allowed to introduce job applicants
- Supervisors and Team Leaders must bring any suspicion of illegal activity regarding agents to management and subsequently the police

Spotting the Signs of Modern Slavery

Supplier staff are also monitored on an ongoing basis after employment. Supervisors are trained to spot the signs of modern slavery, with particular attention paid to a number of factors:

- Physical appearance of their employees – in terms of potential of abuse or malnutrition
- Employees' personal effects, documentation and freedom of movement
- Whether employees are regularly dropped off / collected by a third party
- The influence of third parties on staff.

Child Labour

In addition to our compliance with Human Rights regulations, NOONAN adheres with the Child Labour Law in accordance with the Protection of Young Persons (Employment) Act 1996. The Act is designed to protect the health of young workers and to ensure that work during the school years does not put a young person's education at risk. The law sets minimum age limits for employment, sets rest intervals and maximum working hours, and prohibits the employment of under 18s on late night work. NOONAN have specified records for their workers who are under 18.

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The Dignity at Work Policy

A policy setting out the expected standards and the channels for redress, The Dignity at Work Policy, is in place Group wide. This policy exists as a reference guideline and facilitates any employee or perspective employee who believes that he or she has been treated unfairly, within the scope of this policy, to raise the matter through the Company Harassment Procedure.

Continuous Improvement

NOONAN will keep under review the its Equal Opportunities, Diversity, Human Rights and Child Labour practices to account for changing circumstances across all jurisdictions. This includes appropriate application of both Positive Action and Affirmative Action measures as advised by statutory bodies