Anti-Slavery and Human Trafficking Policy

Policy Statement

Houlihan & Co. has zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

Much modern slavery isn't visible in public.
Someone is in slavery if they are:

- forced to work - through mental or physical threat;
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- dehumanised, treated as a commodity or bought and sold as 'property';
- physically constrained or has restrictions placed on his/her freedom of movement.

Modern forms of slavery can include debt bondage, where a person is forced to work for free to pay off a debt, child slavery, forced marriage, domestic servitude and forced labour, where victims are made to work through violence and intimidation.

Human trafficking involves men, women and children being recruited, harboured or brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will.

The way in which companies operate can affect the likelihood of slavery being a part of the final product. If a supplier is given a large order with a short turnaround time beyond the suppliers' capacity, this could increase the risk of slavery as the supplier may subcontract work where lower standards apply.

Company buyers may negotiate such low prices that suppliers push down the price paid for materials and labour, increasing the likelihood of the use of forced labour.

Companies have a responsibility of ensuring that no forced labour has been used in producing their product. This should apply not only to production on their own factories or sites but also to their suppliers, and suppliers of their suppliers, all the way down the supply chain.

Responsibility for the Policy

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.

Day to day the responsibility for identifying risk and contravention of our Policy lies with our Contracts Managers who are in the frontline and in direct contact with those most at risk.

Compliance with the Policy

Everyone working for Houlihan & Co. must read, understand and comply with this Policy.

Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery as soon as possible, in the first instance to our contracts managers or OHSEQ manager, in confidence.

Our annual statement will provide information to supplement this policy, including details of actions we are taking.

Communication and Awareness of this Policy

This Policy will be communicated to all new starters with the Company and as part of all site inductions to our entire workforce. We will require compliance by all our supply chain, having explained the violation of human rights involved, the legal position and the unacceptability of turning a blind eye to a cancer in our industry.

Richard Knight



Managing Director

16.09.2020