



Modern Slavery & Human Rights Policy

Document Reference: MSHRP-CSR1-2024

Date: 06/02/2024

Author: Tony Roe

McGowans Print: Modern Slavery and Human Rights Policy

Introduction

McGowans Print is fully committed to preventing modern slavery and human trafficking across all aspects of our business and supply chain. We operate in compliance with the Modern Slavery Act 2015 and are dedicated to upholding the highest standards of ethical conduct, transparency, and integrity in all our operations. This policy outlines our approach to preventing modern slavery and human trafficking and safeguarding human rights in line with Section 54 of the Modern Slavery Act.

Our Commitment

We are committed to acting ethically and with integrity in all our business dealings. We enforce effective systems and controls to ensure that modern slavery does not occur within any part of our organisation or supply chain.

Definitions

For the purpose of this policy, modern slavery includes, but is not limited to:

- Forced labour: Any work or service which people are forced to do against their will under threat of punishment.
- Debt bondage: When people borrow money they cannot repay and are required to work to pay off the debt, losing control over the conditions of both their employment and the debt.
- Human trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons for the purpose of exploitation through coercion, abduction, fraud, or deception.

Human Rights Commitment

McGowans Print recognises and respects all internationally proclaimed human rights and is committed to upholding these rights throughout our business and supply chain. We strive to ensure that modern slavery, human trafficking, and other forms of exploitation have no place within our operations.

Our Supply Chain

We expect the same high ethical standards from all our suppliers and business partners. We include specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, within our contracting processes. We require our suppliers to uphold these standards and to ensure their own supply chains reflect the same commitments.

Risk Assessment and Due Diligence

To ensure compliance with the Modern Slavery Act 2015, McGowans Print adopts a risk-based approach to identify areas of our business and supply chain most vulnerable to modern slavery risks. Our due diligence procedures include:

- Assessing potential risk areas in our supply chain.
- Conducting audits and reviews of suppliers to assess their compliance with our Human Rights and Modern Slavery Policy.
- Requiring suppliers to confirm their adherence to the Modern Slavery Act.
- Monitoring supplier performance on an ongoing basis to identify and address risks of modern slavery or human trafficking.

Policies and Training

McGowans Print has several policies in place to support our commitment to combatting modern slavery:

- Human Rights and Modern Slavery Policy: Outlines our zero-tolerance approach to modern slavery across our operations and supply chain.
- Whistleblowing Policy: Ensures that employees and suppliers can confidentially report any concerns regarding modern slavery, human trafficking, or other unethical practices.
- Code of Conduct: Provides clear guidelines on the ethical standards expected of our employees and partners.

While we do not currently provide formal Modern Slavery Awareness training, all relevant policy documents, including our Human Rights and Modern Slavery Policy, are made available to employees via our HR portal. This ensures staff can access the necessary information to understand and uphold our ethical commitments.

Employee Conduct and Responsibility

All McGowans Print employees are responsible for acting with integrity and supporting the values outlined in this policy. We encourage all employees to report any suspicions of modern slavery or human trafficking through our whistleblowing mechanisms. All concerns raised are taken seriously and thoroughly investigated.

Reporting and Compliance

In accordance with Section 54 of the Modern Slavery Act 2015, this policy and our annual Modern Slavery statement will be published on the McGowans Print website. The statement will be reviewed annually to ensure ongoing compliance and transparency.

McGowans Print does not support or conduct business with any entity involved in slavery, human trafficking, or unethical labour practices. Any supplier found to be in violation of our policy will face immediate corrective actions, which may include termination of the business relationship.

Monitoring and Improvement

We are committed to continually improving our systems and processes to identify, prevent, and address modern slavery. McGowans Print regularly reviews the effectiveness of the steps we have taken to combat modern slavery within our business and supply chain.

Corporate Social Responsibility Initiatives

In addition to our modern slavery prevention efforts, McGowans Print promotes social responsibility through various initiatives, including:

- Offering apprenticeships and work experience programmes.
- Sponsoring local charities and sporting organisations, such as Down Syndrome Ireland, Liffey Wanderers, and Swords Celtic.

Approval and Updates

This policy has been approved by McGowans Print's leadership team and will be reviewed and updated annually to ensure it remains relevant and effective in combatting modern slavery.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking statement for the financial year ending 2024

This policy aligns with the requirements of the Modern Slavery Act 2015 and reflects McGowans Print's commitment to ethical business practices and human rights.

Authorised Signature

Tony Roe 06/02/24

Print Name and Title

Tony Roe Managing Director

Version: 1.0

Creation Date: 6th February 2024