
MODERN SLAVERY ACT STATEMENT

Prepared By:

KEELAGHER OKEY ASSOCIATES LIMITED
74A London Road, Stockton Heath, Warrington, WA4 6HR

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Version (5.0)

Signed:



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12/12/2021	1.0	Modern Slavery Act Statement	Annual review	13/12/2022	JFO
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31/01/2026	5.0	Modern Slavery Act Statement			

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PART 1 | STATEMENT & INTRODUCTION

STATEMENT

Whilst we are not legally required under the Act to formally publish a statement relating to Modern Slavery and Human Trafficking, Keelagher Okey Associates Ltd (trading as KOK) recognises that this is an extremely important subject and have consequently put procedures in place to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

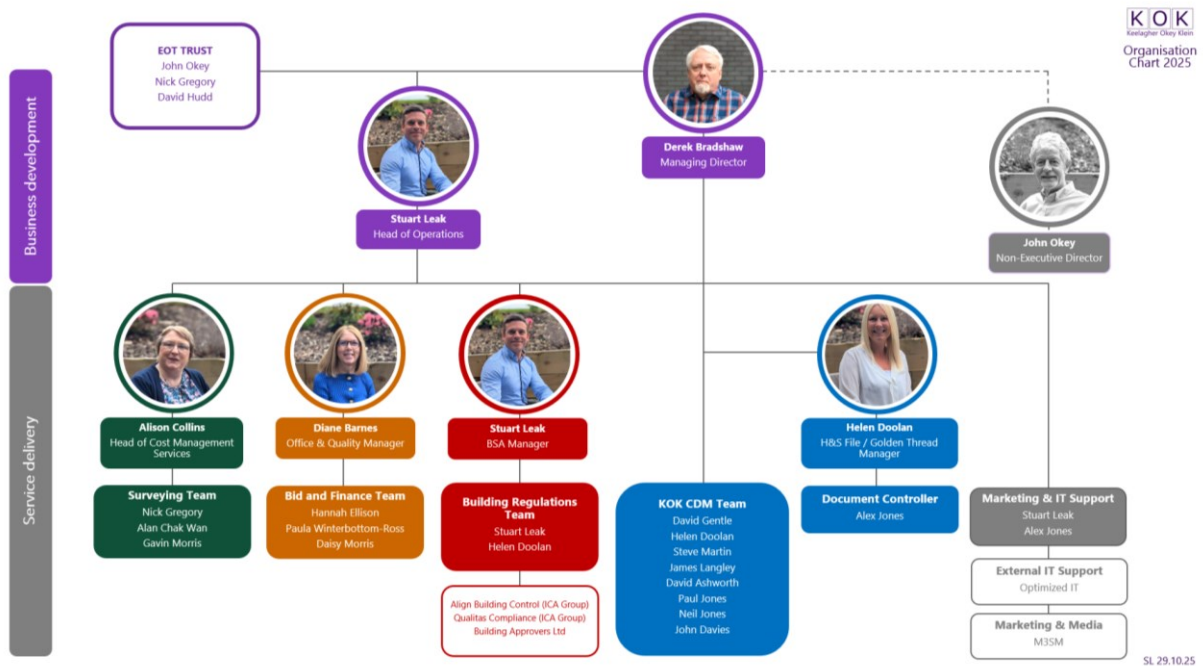
INTRODUCTION

We are committed to respecting human rights and ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships, in line with our core values.

We commit to further improving business practices to combat modern slavery and to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by KOK during the year ending 31 March 2024.

PART 2 | ORGANISATION & SUPPLY CHAINS



OUR ORGANISATION AND SUPPLY CHAINS

KOK is an independent certified consultancy practice, bringing together a multi-disciplinary team who are extraordinary in their knowledge and experience within the construction industry, providing our clients with a wealth of expertise that we can tailor to suit any project or requirement. We are regulated by the Royal Institution of Chartered Surveyors (RICS), are a Registered Practice of the Association for Project Safety (APS), registered with Constructionline and hold SSIP membership.

Our business, including our supply chains, is primarily carried out within the UK. We have our main office in Warrington, Cheshire and persons working remotely around the UK. This statement is applicable to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

OUR COMMITMENT TO COMBATTING MODERN SLAVERY AND HUMAN TRAFFICKING

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 have a zero-tolerance approach to modern slavery and we are committed to:

- Acting ethically and with integrity in all our business dealings and relationships
- To implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains
- To improving our practices to combat slavery and human trafficking
- To ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

PART 3 | POLICIES, PROCESSES & PROCEDURES

POLICIES, PROCESSES AND PROCEDURES

The following policies, processes and procedures are available to all employees via our Sharepoint system:

- Code of conduct
- Recruitment procedure
- Protection of Vulnerable Groups policy
- Whistleblowing policy
- Procurement procedure

Through these policies and the measures below we can increase awareness of human rights risks and how they can be identified and addressed.

- We procure in accordance with the principles of fairness and transparency and our purchasing contract templates reflect modern slavery legislation.
- Employees are aware of how to report incidents of concern and are encouraged to do so. They can do this through their managers or through the Whistleblowing procedure.
- Employees are recruited lawfully following clearly communicated procedures and right to work checks are carried out to ensure that individuals have the right to work in the UK. Only reputable recruitment agencies are used for temporary staff and are subject to our procurement process prior to engagement

TRAINING

We have various training modules available to all employees via an eLearning platform LITMOS, including compliance-based modules. Employees are also required to read key policies and procedures as part of our documented induction process.

Specific Anti-Modern Slavery and Human Trafficking training has been accessible via our eLearning platform by request for some employees; however, we recognise that to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, that we need to make this available to all and increase awareness. To this end we will make Anti-Slavery training one of the mandatory courses for all staff during the coming year (April 2026 - March 2027). This will be reviewed in March 2026.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Further to our commitment to train all employees on Modern Slavery, we will report on the completion rates of this training alongside our existing suite of mandatory courses. This is reported to our Senior Management Team throughout the year.

FURTHER STEPS

Following a review of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take further steps to combat slavery and human trafficking within the next financial year.

KOK will:

- Share this statement with employees and signpost to other resources such as the Modern Slavery Helpline and the “Stronger Together” initiative, to raise awareness of the Modern Slavery Act and what action to take if they have concerns.
- Make “Modern Slavery and Human Trafficking” part of our suite of mandatory learning, available to all employees via our eLearning platform.
- Add both the statement and training to our induction process for all employees.
- Include specific provisions in our standard purchasing templates for supplier contracts to require suppliers to manage and reduce the risk of forced labour and to ensure these are consistent with the Modern Slavery Act. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2026.

This statement is reviewed annually and approved by KOK’s Senior Management Team, which has responsibility for ensuring its implementation.



Name: Derek Bradshaw
Position: Managing Director
Date: 31st January 2026