

HR Policy Number	HR 000	Scope	All staff
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## HR0024 - Modern slavery & Human trafficking policy

This is an original Port of Cork Company (POCC) policy and procedure and is available to each employee via the Port of Cork Connect Communications or other App. All such policies will be updated, distributed, and circulated to each employee via the Port of Cork Connect Communications App, and, in future, any changes or updates will be distributed and available in this way.

### 1. Policy Statement Overview

POCC are committed to preventing any form of modern slavery and human trafficking in our operations and/or supply chain. We recognise that modern slavery is a serious violation of human rights and encompasses forced labour, human trafficking, and other forms of exploitation (including the exploitation of children). This policy statement outlines our commitment to combatting modern slavery in all its forms and ensures transparency in our practices.

### 2. Purpose

The purpose of this policy statement is to ensure that all employees, suppliers, and other partners understand our commitment to preventing modern slavery and to establish a framework for identifying and addressing potential risks within our operations and supply chain.

### 3. Scope

This policy statement applies to all employees, subcontractors, and suppliers of POCC and encompasses all areas of our supply chain.

### 4. Our Commitment

- Zero tolerance: we have a zero-tolerance approach to modern slavery and human trafficking. We will not tolerate any form of exploitation or abuse within our business or supply chain.
- Compliance with laws: we are committed to comply with all applicable laws and regulations regarding human rights and labour practices, including Ireland's *Criminal Law (Human Trafficking) Act 2008* as may be amended, working time laws, and any other relevant laws that are applicable to our operations.
- Supply chain expectations: we expect our subcontractors, suppliers, and partners to adhere to the same high standards of ethical conduct and to implement practices that prevent modern slavery in their operations, and we have developed a comprehensive 'responsible sourcing code' for our subcontractors and suppliers ensuring that they confirm their commitment to these standards. POCC will not work with any subcontractor, supplier, or other partner who either does not meet or breaches these standards.

### 5. Monitoring

POCC has built an extensive network of well-established and reputable suppliers and subcontractors which whom we maintain strong relationships. Before entering any commercial relationship with them, we assess the suppliers and/or subcontractors, including assessing whether there is a vulnerability to modern slavery. Part of our assessment will also include an evaluation of the subcontractor's and supplier's labour practices and, throughout our relationship with them, we strive to ensure compliance with our policies and standards.

## **6. Speaking up**

We encourage all employees and stakeholders to report any concerns regarding modern slavery or human trafficking and we have established a protected disclosures policy that outlines how individuals can report concerns confidentially and without any fear of retaliation. We have also confirmed this process in our responsible sourcing code.

## **7. Reporting knowledge or suspicion of slavery or human trafficking**

All employees and partners within the Port have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported.

In addition, our Whistleblowing Policy provides for alternative avenues for reporting, including in respect of suspicion or knowledge of slavery or human trafficking. Employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal. These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with. Our Anti-Slavery and Human Trafficking Policy also includes contact details for the following in respect of potential external reporting:

- In the Republic of Ireland, if you are a victim of modern slavery or human trafficking, or you spot a suspected case, you can contact the [Migrant Rights Centre Ireland](https://www.mrci.ie/) at (00353) (0) 1 889 7570, or email [info@mrci.ie](mailto:info@mrci.ie)<sup>7</sup>.
- In the Republic of Ireland, if you consider yourself, or someone you know, to be a victim of human trafficking, you should report your concerns to the Garda Síochána (Irish police force). In an emergency, you should call 999 or 112.

If you wish to report suspicions of human trafficking confidentially you can call the Garda Confidential Line on 1800 666 111 or Crimestoppers on 1800 250 025. You can also email suspicions or concerns you wish to share with the Garda Síochána (Irish police force) to [blueblindfold@garda.ie](mailto:blueblindfold@garda.ie).

## **7. Statement of commitment**

This statement is made on behalf of POCC and reflects our commitment to preventing modern slavery in all its forms either within our operations or our supply chain. We will continue to develop and implement measures to combat modern slavery and ensure that our business practices uphold the highest standards of human rights.