

Patrick Donaghy & Co. LLP. Solicitors

MODERN SLAVERY STATEMENT OF PATRICK DONAGHY & CO. LLP

(Financial Year End 30th June 2023)

Introduction

Under the (UK) Modern Slavery Act 2015 all bodies corporate and partnerships who (irrespective of where they are incorporated) (1) carry on a business, or part of a business, in the UK supplying goods or services, and (2) have a consolidated global turnover of above £36 million (or Euro equivalent) per annum, are required to prepare and publish an annual “Slavery and Human Trafficking Statement”.

The Republic of Ireland has similar legislation, primarily the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013.

Modern slavery

“Modern slavery” refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults;
- the trafficking of adults into conditions of labour exploitation;
- the trafficking of adults into conditions of criminal exploitation;
- the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation

“Human trafficking” is a global crime that trades in people and exploits them for profit. “Human trafficking” is defined in the UN Trafficking in Persons Protocol, which supplements the United Nations Convention against Transnational Organized Crime, as “the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation”. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery in the Republic of Ireland. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

Modern slavery includes victims who have been brought from overseas and vulnerable people in the UK, the Isle of Man and in Ireland who are forced to work illegally against their will. This is across many different sectors such as agriculture, hospitality (catering, etc.), construction, car wash services, retail and manufacturing.

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Patrick Donaghy & Co. LLP is a Limited Liability Partnership authorised and registered in Ireland by the Legal Services Regulatory Authority with Registration Number 1262314

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Our policy

The policy of Patrick Donaghy & Co. LLP is to conduct all of our business in an honest and ethical manner, and to comply with all applicable legislation. We endeavour to ensure that neither modern slavery nor human trafficking has any connection to our business; this objective is implicit in our policies and procedures. We have a zero-tolerance approach to violations of anti-slavery and human trafficking laws.

If breaches of these laws are found within our practise, we will immediately take steps to comply with the applicable legislation.

We are committed to acting professionally and with integrity in all our business dealings and relationships.

We will review this policy and its operation in practice on an annual basis.

Reporting knowledge or suspicion of slavery or human trafficking

All employees and partners within the firm have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any suspicion or knowledge of slavery or human trafficking is to be immediately reported to the Managing Partner who will decide what further action, if any, is deemed necessary. If the issue reported also relates to knowledge or suspicion of money laundering or terrorist financing, then a further report is to be submitted to the firm's Money Laundering Reporting Officer (MLRO).

These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with.

To date during the current financial year ended 30th June 2023 our Managing Partner has not received any reports related to knowledge or suspicion of slavery or human trafficking.

Clients

Our client acceptance and ongoing monitoring procedures include detailed risk assessments of each client from an anti-money laundering, counter-terrorist financing, counter-proliferation financing, and wider risk perspective. These include a review for potential publicly available indications of previous or current involvement with criminality, including modern slavery and human trafficking. All of our clients are situate in the Republic of Ireland with among the lowest prevalence of modern slavery, the highest degree of government response to modern slavery, and the lowest level of vulnerability to modern slavery (as per the Global Slavery Index 2023).

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Employment procedures

Patrick Donaghy & Co. LLP has procedures in place pertaining to our employment practices including robust recruitment processes in line with Republic of Ireland employment law including “right to work” document checks, contracts of employment, and checks to ensure all employees are above the minimum working age.

Supply chain/ Procurement.

Patrick Donaghy & Co. LLP recognises that our firm is exposed to a greater slavery and human trafficking risk when dealing with suppliers of products and services. However, we consider that we, and the majority of our suppliers, are not in industries with a high risk of modern day slavery. In addition, our supply chains are primarily confined to the Republic of Ireland with a relatively lower risk of modern day slavery and human trafficking. The majority of our suppliers are situated in the Republic of Ireland with among the lowest prevalence of modern slavery, the highest degree of government response to modern slavery, and the lowest level of vulnerability to modern slavery (as per the Global Slavery Index 2023).

Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above.

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