

## Modern Slavery and Human Trafficking Statement

### Introduction

mcs group are a building contractor working within the motor retail, commercial, industrial, residential and educational sectors in the UK.

This statement details mcs group (including mcs build limited, mcs special project and mcs primary project) will manage all potential modern slavery risks related to its business and control measures put in place steps to ensure that there is no slavery or human trafficking in its own business and its supply chain. This statement relates to actions and activities during the financial year 2016.

The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking, is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chain is free from slavery and human trafficking.

### Organisational structure and supply chains

The company has reviewed the Modern Slavery Act 2015 including the industry guidance and has undertaken a risk assessment of its work process to identify activities that are high risk in relation to slavery or human trafficking. The company has identified the constructions activities that require the use of labour gangs (i.e. ground works, concreting or erection) as high risk by the company. These work activities use labour gangs that could be susceptible to slavery or human trafficking

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Directors and management of mcs group are responsible for the implementation, monitoring and review of the policy.
- **Risk assessments:** The Directors and management of mcs group have undertaken a risk assessment of its work activities which is reviewed on an annual basis.
- **Investigations/due diligence:** All subcontractors must complete the mcs group pre-qualification questionnaire which requires them to confirm arrangements are in place to prevent the employment of illegal workers, slavery or human trafficking.

Where there are suspected cases of slavery or human trafficking the directors are to be informed and an internal investigation undertaken. Advice will be taken from the authorities where cases are found.

### Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation

strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Subcontractors code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to confirm in the subcontractors questionnaire that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Any serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship and information passed on to the relevant authorities.
- **Agency workers policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. All agency workers are required to provide evidence they have the right to work in the UK, they have the skills and competence to undertake the job role. This includes details of their experience and references from previous employers.

#### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

#### Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- developing a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

#### Awareness Training

The organisation requires members of the contracts teams to be made aware and issued with this policy. The contracts team are to understand:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- the risk of slavery and human trafficking in relation to various aspects of the business;
- if suspected or found the issue is to be escalated to the directors of the company;

**HR-C33 - HR POLICIES**

- external help is available, for through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- that subcontractors, suppliers and other business partners are aware of anti-slavery policies; and
- the steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

A handwritten signature in blue ink, consisting of a large loop followed by a horizontal line with a wavy end.

**Keir Edmonds, Managing Director**

06.01.2021