



Modern Slavery and Human Trafficking Policy 2021

MCS GROUP

MCS BUILD, MCS SPECIAL PROJECTS & MCS PRIMARY PROJECTS

Revision	Status	Author	Amendment Date	Issue / Re issue Date
A	Initial Draft	-	-	4 th January 2021
B	2 nd Draft	-	6 th January 2021	10 th January 2021
C	Completed	-	-	10 th January 2021
D	Reviewed	Darren Callis	1 st June 2021	2 nd June 2021

Introduction

MCS Group are absolutely committed to combating slavery and human trafficking within its organisation and its supply chains and to ensuring that it does business in an ethical manner and with respect for its people and the communities in which they live.

MCS Group believes that this commitment will benefit its customers and other stakeholders affected by The MCS Group activities. MCS Group recognises, however, that it is but one link in a supply chain to the end user that is long and global.

Therefore, it is essential that MCS Group suppliers also understand and appreciate the standards of business conduct that are expected of any company that does business with MCS Group

Organisation Structure

MCS covers all aspects of Construction.

Experienced in working with major brands across Europe and beyond, MCS understands and delivers the level of consistency needed in regional, national and international fit-out and refurbishment plans.

Mechanical services include the design and installation of:

duct work, air conditioning, boilers, public health drainage, lighting, security and protection, plumbing as well as hot and cold-water pipework. Electrical services include small power, lighting, security and fire alarms.

MCS Group business covers the following key areas:

- Commercial buildings
- Hospitality
- Retail
- Residential
- Public Sector

MCS Supply Chains

MCS Group supply chains include:

- Agency
- Distribution
- Procurement of goods & services
- Outsourcing

- Subcontracting

MCS Group Policies On Slavery And Human Trafficking

MCS Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

MCS Group Modern Slavery & Human Trafficking Policy will reflect on MCS Group commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

Due Diligence Processes For Slavery And Human Trafficking

As part of MCS Group initiative to identify and mitigate risk it ensures that new suppliers must complete MCS Group Sub-Contractor Qualification Questionnaire prior to engagement in order to evaluate the risks of modern slavery and human trafficking.

If deemed necessary, suppliers will be visited on site, and are re-audited on or around every 3 years to ensure adherence to the MCS Group strict standards of ethically transparent supply chains.

All suppliers have been contacted to express MCS Group commitment to tackling modern slavery throughout our supply chains and have been provided with a copy of our Modern Slavery and Human Trafficking policy.

A new clause has been added to the MCS Group Standard Sub-Contract amendments and will be a condition precedent to any future sub-contractor appointments. Existing suppliers also have their Subcontractor Qualification audited and renewed every 3 years.

The MCS Group is also taking steps to put in place systems to:

- Monitor potential risk areas in its supply chains
- Protect whistle blowers

MCS Group's Effectiveness In Combating Slavery And Human Trafficking

MCS Group are developing the following means to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its businesses or supply chains:

- Business function reports
- The MCS Group supplier prequalification questionnaire completed
- Standard subcontract amendments included
- Supplier renewals reviewed
- Internal staff training and induction processes – 100% achieved.

- MCS Group suppliers are obliged to conduct due diligence and audit their own supply chains and report on the findings – All suppliers send the MCS Group statement and Modern Slavery and Human Trafficking Policy annually.