

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

The statement sets down Manchester & Cheshire Construction Company Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Modern slavery is an international crime and a violation of fundamental human rights. It is a global problem that transcends age, gender and ethnicities. It may take 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.

It permeates many aspects of the legitimate economy and the construction industry is one of the many industries in the UK targeted by traffickers and illegal/unlicensed gangmasters.

The Modern Slavery Act 2015 was introduced in the UK in October 2015 with the aim of stamping out slavery and trafficking and created a number of new criminal offences. It also increased penalties and strengthened the powers of the police and border forces. The Act also contains a number measures intended to encourage businesses to take steps to address modern slavery. In particular, commercial organisations supplying goods or services with a turnover above £36 million must now comply with disclosure requirements.

### **Purpose of this Policy**

The purpose of this policy is provide information and guidance to all persons working for MCC in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

### **Our Policy Statement**

MCC takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed 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. We expect the same high standards from all of our contractors, consultant, suppliers and other business partners, and expect our supply chain to impose the same standards on their own supply chain. We will therefore require this policy to be included in our supply chain contracts and appointments, and to be complied with.

## **Policy Application**

This policy applies to all persons working for MCCs, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers and our supply chain including all sub-contractors, consultants, service providers, joint venture partners and any other agents, thirdparty representatives and business partners.

## **Compliance with the policy**

All our employees must read, understand and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those that either work for MCC or are under our control to ensure the prevention, detection and reporting of any possible breaches of this policy. All our employees are encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage.

MCC encourages openness and transparency and any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our employees are encouraged to act without any fear of reprisal. If an employee believes or suspects that there has been a breach of this policy, or a breach may occur in the future, they must notify their line manager and HR Manager or do so via MCC's Whistleblowing Procedure as outlined in the Company Handbook as soon as possible.

MCC will do everything it can to protect the confidentiality if this has been requested by an employee. However, employees are discouraged from making any disclosures anonymously, as this can limit the investigation process. Following an internal investigation, MCC may decide to alert the police.

## **Safeguards**

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If an employee considers that they have suffered any such treatment, then they should inform the HR Manager immediately or by using MCC's Grievance Procedure which can be found in the Company Handbook.

## **Communication and awareness of this policy**

MCC recognises its statutory obligations in connection with the Modern Slavery Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains.

However, we recognise that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonable able, to prevent modern slavery from occurring:

- We will provide training on this policy to all our employees focussing on the risk MCC's business faces from modern slavery in its supply chains.



Manchester & Cheshire Construction Co. Ltd

- We will communicate MCC's zero-tolerance approach to modern slavery and this Policy to all sub-contractors, consultants, joint venture partners and any other agents, third-party representatives and business partners at the outset of our business relationship with them and as appropriate thereafter.
- We will introduce contractual provisions for all our suppliers to confirm their adherence to this Policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- We will include in the 2019 directors' report accompanying our annual financial statements a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on our website during the course of 2019.
- We will review this Policy annually and update it where necessary.

### **Breaches of this policy**

Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any claims or allegations which are found to be malicious or vexatious will result in disciplinary action being taken against the individual. We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

### **Supply Chain and Third Party Compliance with this Policy**

Those who are accessing this policy because they are either seeking to have or already have a business relationship with MCC are also advised to familiarise themselves with this Policy and should refer any questions or comments to our head office.

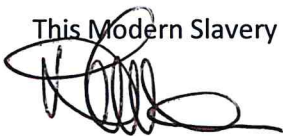
### **Responsibility for the Policy**

The board of directors of Manchester and Cheshire Construction Company Limited has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations, and that all those under our control comply with it.

Management at all levels within our business are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:



**Dave Lowe**

Managing Director of Manchester & Cheshire Construction Company Limited

8<sup>th</sup> July 2019