

Modern Slavery Policy

MC Construction



July 2025

1. Overview and how we define Modern Slavery

- 1.1 Modern Slavery encompasses slavery, forced labour, servitude, and human trafficking – all of which are serious criminal offences that deprive individuals of their liberty and often involve financial or other exploitation.
- 1.2 We are committed to conducting our business fairly, ethically, and with full respect for fundamental human rights. We maintain a zero-tolerance approach to all forms of Modern Slavery within our operations and supply chains.
- 1.3 This policy applies to anyone working for or on behalf of the company, including employees, directors, officers, consultants, volunteers, suppliers, and service providers. All individuals must read and comply with this policy.
- 1.4 Non-compliance with this policy may result in disciplinary action, including dismissal or termination of contract, and may also lead to legal proceedings.
- 1.5 The Anti-Slavery Officer (ASO), currently the Managing Director, is responsible for overseeing this policy and ensuring compliance.
- 1.6 This policy does not form part of any employee's contract of employment and may be amended at any time.

2. Preventing Modern Slavery in our business

- 2.1 We conduct appropriate due diligence on all employees, recruitment agencies, and suppliers to ensure transparency and accountability.
- 2.2 All employees receive written contracts and are paid in accordance with applicable laws. We uphold all legal obligations regarding health and safety, working hours, rest breaks, and holidays.
- 2.3 We provide regular training to employees and relevant third parties to raise awareness of Modern Slavery risks and prevention strategies

3. If you are one of our Suppliers

- 3.1 Suppliers must assess their operations and supply chains and confirm to our ASO that they:
 - Comply with all legal obligations related to Modern Slavery.
 - Are committed to eradicating Modern Slavery from their business and supply chains; and
 - Provide a current copy of their Anti-Slavery Policy.
- 3.2 Any breach of this policy, or discovery of Modern Slavery within a supplier's operations or supply chain, may result in immediate contract termination and legal action.

4. If you are an Employee or a Worker providing services for us

- 4.1 You must promptly report any suspicions of Modern Slavery to our ASO. The ASO will investigate and report the findings to the Board of Directors, with appropriate actions taken, as necessary.
- 4.2 You will not face any detrimental treatment for reporting genuine concerns in good faith, even if they are later found to be mistaken. If you believe you have been treated unfairly for raising concerns, contact the ASO or refer to our Grievance and Whistleblowing Policies.

5. Transparency and Reporting

- 5.1 In accordance with the Modern Slavery Act 2015 (as amended in 2025), we publish an annual Modern Slavery Statement on our website and include it in our Directors' Report.
- 5.2 We reserve the right to audit suppliers and third parties to ensure compliance with this policy and applicable legislation.

6. Review and Updates

- 6.1 This policy will be reviewed annually and updated to reflect changes in legislation, best practices, and company operations.



If you have any questions regarding anything within this policy, please speak to Sophie Houghton.

Anti-slavery and human trafficking policy

Policy statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The Company has a zero tolerance approach to modern slavery, with expanded enforcement powers and victim support provisions and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems, controls, and mandatory training programs to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, with updated transparency and audit requirements, consistent with its obligations under the Modern Slavery Act 2015 (as amended to 2025).

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in diverse ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, suppliers may go to great lengths to hide the fact that they are using slave labour.

However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners.

Responsibility for the policy

The directors have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. They day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems, policies, and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. Investigated allegations of modern slavery in the Company's business or supply chains, with updated transparency and audit requirements.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, with updated transparency and audit requirements, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy or via the updated Whistleblowing Procedure. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains, with updated transparency and audit requirements as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains, with updated transparency and audit requirements constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 or consult the Independent Anti-slavery Commissioner's guidance for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains, with updated transparency and audit requirements.

The Company's zero tolerance approach to modern slavery, with expanded enforcement powers and victim support provisions must be communicated to all suppliers, contractors and other business partners when entering new or renewed contracts with them.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.



Russ Forshaw

Managing Director of Manchester & Cheshire Construction
July 2025

Modern Slavery and Human Trafficking Statement

Introduction

The statement sets down Manchester & Cheshire Construction's (MC Construction) 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, with updated transparency and audit requirements. We all have a duty to be alert to risks, however small. Staff are expected to report on 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 to exploit them for personal or commercial gain.

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

The Modern Slavery Act 2015 (as amended to 2025) was introduced in the UK with the aim of stamping out slavery, trafficking, and creating new criminal offences. It also increased penalties and strengthened the powers of the police and border forces. The Act also contains measures intended to encourage businesses to take steps to address modern slavery. Commercial organisations supplying goods or services with a turnover of over £36 million must now comply with disclosure requirements.

Purpose of this Policy

The purpose of this policy is to provide information and guidance to all people working for MC Construction 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

MC Construction takes a zero-tolerance approach to modern slavery, with expanded enforcement powers and victim support provisions and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems, controls, and mandatory training programs to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains, with updated transparency and audit requirements.

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, with updated transparency and audit requirements, consistent with our disclosure obligations under the Modern Slavery Act. We expect the same ambitious standards from all our contractors, consultants, 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 people working for MC Construction, 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, third-party 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 prohibited. It is the responsibility of all those that either work for MC Construction or are under our control to ensure the prevention, detection and reporting of any 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.

MC Construction 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 MC Construction's Whistleblowing Procedure or the updated Disclosures in the Public Interest Policy as outlined in the Company Handbook as soon as possible.

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

Safeguards

We are committed to ensuring no one suffers any detrimental treatment because 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 MC Construction's Grievance Procedure which can be found in the Company Handbook.

Communication and awareness of this policy

MC Construction 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, with updated transparency and audit requirements.

However, we recognise that we do not control the conduct of individuals and organisations in our supply chains, with updated transparency and audit requirements. We will take the following

measures to ensure compliance, as far as we are reasonable able, to prevent modern slavery from occurring:

- We will provide training on this policy to all our employees focusing on the risk MC Construction's business faces from modern slavery in its supply chains, with updated transparency and audit requirements.
- We will communicate MC Construction's zero-tolerance approach to modern slavery, with expanded enforcement powers and victim support provisions and this Policy to all sub-representatives, 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 monitor 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 our directors' report and our annual financial statements and the Modern Slavery Registry a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on our website.
- We will review this Policy regularly and update it to reflect legislative changes 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 of 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 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 MC Construction are also advised to familiarise themselves with this Policy and should refer to any questions or comments to our head office.

Responsibility for the Policy

The board of directors of MC Construction 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, with updated transparency and audit requirements.

This 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 Statement has been approved and authorised by:



Russ Forshaw

Managing Director of Manchester & Cheshire Construction

July 2025