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### 1. **Policy Statement**

Modern Slavery is a crime resulting in an abuse of vulnerable workers and a violation of human rights. The deprivation of a person's liberty by another in order to exploit them for personal or commercial gain is unacceptable. We understand it can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

The McGrath Group recognises that it has a responsibility to ensure that our recruitment and supply chain processes are robust enough to make it impossible for slavery, forced labour or human trafficking to be used.

The company is committed to maintaining and enforcing effective systems and controls to prevent slavery and human trafficking in all our corporate activities, and to ensure that our supply chains are free from slavery and human trafficking.

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, agents, contractors, consultants and business partners. The company expects the same high standards from all of its suppliers, contractors and other business partners.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

### 2. **Responsibilities**

The Board of Directors have overall responsibility for ensuring that this policy complies with the company's legal and ethical obligations. Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. In addition, some 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 all workers are not being exploited, that they are safe and that relevant employment, health and safety, human rights laws and standards are being adhered to, including freedom of movement and communications.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains, is the responsibility of all those working for the company or under the company's control. Employees are required to avoid any activity that might lead to a breach of this policy.

### 3. In Practice

The company has a zero tolerance approach to modern slavery and is committed to acting ethically with integrity and transparency in all of its business dealings and relationships, to implementing and enforcing effective systems and controls 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, consistent with its obligations under the Modern Slavery Act 2015.

The company sets out actions to understand all potential modern slavery risks related to its business and has put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business activities and our supply chains.

The company's approach to Modern Slavery are as follows: -

- The use of 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
- The company's zero tolerance approach to modern slavery is communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them
- 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
- To ensure 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
- To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject
- All staff responsible for recruitment or involved with subcontractors or agency workers are trained in how to recognise Modern Slavery and what to do if they suspect its presence
  
- Our recruitment process includes:
  - Right to Works checks
  - Shared residential address
  - Highly populated
  - Payroll process awareness
  - Multiple payments to same bank account

All staff responsible for recruitment or are involved with subcontractor or agency workers are trained in how to recognise modern slavery and what to do if they suspect its presence.

Our recruitment process includes Right to Work checks, the following are carried out: -

- Shared residential address
- Payroll process awareness
- Multiple payments to same bank account

## MODERN SLAVERY POLICY



If anyone believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with the Company's Whistle-blowers Policy.

Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the company's business or supply chains as soon as possible.

If anyone is unsure about whether a particular act, the treatment of workers or their working conditions within any of the company's supply chains constitutes any of the various forms of modern slavery, again it should be immediately raised. Matters can also be raised by contacting the government's Modern Slavery Helpline on 0800 0121 700, who are able to provide further information and guidance on modern slavery.

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 be involved in modern slavery.

We remain dedicated to strengthening our practices in this area and will continue to develop further measures, including the training of staff where appropriate, to further reduce the risk of slavery and human trafficking taking place within our own business and across our supply chains.

This policy should be read in conjunction with our other operating policy documents.

Our processes and procedures for implementing our business values and our responsibilities are contained in specific, separate and more detailed documents which are implemented via our Integrated Quality, Environmental.

We also operate an integrated management system which is certified against international standards ISO 45001:2018 (Health & Safety Management), ISO 9001:2015 (Quality), ISO 14001:2015 (Environmental) and ISO 50001:2011 (Energy) ensures our products and services are supplied safely, consistently and sustainably.

Internal assessments of our operations will be performed to determine if this policy or any others including procedures and processes fulfil their objective.

Signed:

A handwritten signature in dark ink, appearing to be "D. McGrath", written over a circular scribble.

**David McGrath, Managing Director**