

# Anti-Slavery and Human Trafficking Policy Statement

## Policy Statement

**This policy statement sets out the approach McGee Group (Holdings) Limited and its subsidiaries have taken to date and those it intends to continue taking with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.**

We have 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 and enforcing 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 expect our suppliers to hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third- party representatives and business partners.

## Our Organisational Structure

We're a London-based, specialist engineering contractor, delivering integrated, complex engineering solutions for our customers. We're employee-owned and self-deliver the following services, environmental, demolition, piling, civil engineering and structures.

## Our Commitments

We will continue to monitor and record anti-slavery checks for all personnel working within our business at the point of induction, we will also use toolbox talks and posters across the business to raise awareness at site levels and beyond.

In addition to the required Achilles (or similar) Accreditation, we also carry out our own advanced audits and pre-qualification questionnaires on all Agencies and Sub-Contractors who supply temporary workers to our projects. These audits probe extensively into all areas of employment, how people are paid and what benefits they receive. In doing so we ensure that all suppliers can demonstrate the robustness of their internal checks and these satisfy our standards prior to being permitted onto our supply chain.

We also aim to work closely with smaller members of our supply chain to ensure they are fully aware and compliant with the Modern Slavery Act. We also undertake enhanced supply chain audits for Right to Work and MS compliance.

## Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of our induction process for all individuals who work for us, and regular training will be provided as necessary. Our new e-learning portal launched this year features a new compulsory, Anti-Slavery and Human Trafficking

module to be undertaken during new starter probationary periods. This online training module was also rolled out to our existing workforce and marked as mandatory.

## **Transparency**

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, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

## **Responsibility for this statement**

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Line managers at all levels are responsible for ensuring 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.

## **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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 us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it to another member of the management team as soon as possible.

## **About this policy statement**

This policy statement is made in accordance to section 54(1) of the Modern Slavery Act 2015 and constitutes McGee Group (Holdings) Ltd, slavery and human trafficking statement for the financial year ending 2020.

### **This policy has been approved and authorised by:**

**Name:** Seb Fossey  
**Position:** Managing Director  
**Date:** 11/11/2020  
**Signature:**

