

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT**

May 2026

### **Policy Statement**

This policy statement sets out the approach McGee Group (Holdings) Limited and its subsidiaries (McGee) takes with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes 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. 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, consistent with our disclosure obligations under the Modern Slavery Act 2015. 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.

You should read this policy carefully and ensure that you understand your obligations and responsibilities.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### **Our Organisational Structure**

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

### **Our Commitments**

We are committed to the prevention of modern slavery and human trafficking across all areas of our operations and supply chain. To support this, we carry out rigorous checks and maintain robust processes to ensure compliance with the Modern Slavery Act 2015.

Prior to induction, all personnel working within our business are subject to anti-slavery checks, the outcomes of which are recorded and monitored. To further raise awareness at site and operational levels, we actively promote anti-slavery messages through toolbox talks, posters, and other internal communications.

In addition, we prioritise subcontractors that hold the Common Assessment Standard (CAS) standard, such as the Achilles or equivalent accreditation. We conduct our own audits and/or pre-qualification questionnaires for all agencies and sub-contractors supplying temporary workers. These audits examine all areas of employment practices, including methods of pay and the benefits provided. Only suppliers who can clearly demonstrate the robustness of their internal employment checks and compliance with our standards are approved for inclusion on our supply chain.

We also undertake enhanced audits relating to Right to Work and modern slavery compliance. We aim to place particular focus on supporting smaller suppliers within our network, working collaboratively to help them fully understand and comply with all relevant legislation and ethical employment standards.

## **Training**

Training on the risk our business faces from modern slavery in its supply chains, forms part of our induction process.

## **Your responsibilities and how to raise a concern**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain 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 must notify your manager, HR or the confidential helpline as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

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 that a breach of this policy has occurred or that it may occur you must notify your manager OR report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chain.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or through the confidential helpline, Safecall: 0800 9151571.

We aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on McGee Connect under [My HR](#).

## **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.

### **About this policy statement**

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

### **Commitment**

The board of Directors fully endorses this policy statement and recognises that effective implementation of this policy is paramount to the successful operation of our business.



Bernard O'Reilly, Managing Director

**McGee Group (Holdings) Ltd**