

## Modern Slavery and Human Trafficking Statement

### Introduction

At MJ Gleeson plc we are committed to maintaining the highest ethical standards in all our relationships across all our businesses. Our reputation is extremely important to us and is built around us maintaining these standards.

MJ Gleeson plc and its subsidiaries (the "**Group**") recognise modern slavery and human trafficking as an important human rights issue and we are committed to taking appropriate and proportionate steps to ensure human rights are fully upheld within our Group and within our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "**Act**") and constitutes our Group's modern slavery and human trafficking statement for the financial year ended 30 June 2021 as approved by the Board on [23 November 2021].

This statement reports on our organisation and businesses, policies, training, due diligence procedures, risk assessment, effectiveness of measures taken and training. This statement is updated on an annual basis.

### Our Business

The MJ Gleeson plc group undertakes two principal activities – building affordable quality homes (Gleeson Homes) and promoting land to meet the growing need for housing (Gleeson Land). These activities are carried out by a number of trading entities over numerous sites / locations, all of which are in the UK.

- (i) As our housebuilding activity is labour and material intensive there is a risk both from sourcing materials and the engagement of labour. All our activities are UK based and the majority of our materials come from UK suppliers who must comply with the Act. We are, however, aware that our suppliers may source materials outside the UK. We are also aware that while the majority of our employees and sub-contractors are UK nationals we will also employ or contract with non-UK nationals where the risk of modern slavery may be higher.
- (ii) Our land promotion business employs a small number of professional / office-based staff and its suppliers are principally professional consultancy businesses. It does not purchase any materials and therefore has a short and limited supply chain.

### Our Policies

We have a dedicated compliance team, which consists of:

- HR Director

- Head of Legal and Company Secretary
- Group Commercial Director
- Head of Health and Safety

All of whom manage the actions in respect of this statement and report directly into the Executive Directors.

We have a Group policy on modern slavery and human trafficking. All employees are made aware of this through inductions, our employee handbook and on our intranet. We also have a robust whistleblowing policy and procedure in place with both internal and external reporting lines, which allows concerns to be reported on a confidential basis and without fear of recrimination.

## **Steps we have taken in the year**

### **1. Group Anti-Slavery Policy**

We have updated our Group policy on Anti-Slavery and human trafficking, to:

- a) better define who is responsible for ensuring that the policy complies with our legal and ethical obligations;
- b) include clearer information on how our employees can report issues or suspicions of modern slavery;
- c) update how we communicate with our supply chain and ensure that they also comply with their legal and moral obligations; and
- d) set out the procedure we follow for site-based audits.

The policy has, and continues to be, implemented throughout the business.

### **2. Supplier Due Diligence**

To ensure that all those in our supply chain comply with our values, we have in place a Modern Slavery questionnaire which for new suppliers and contractors, forms part of our prequalification process; and for all existing suppliers and contractors is an annual requirement. Where suppliers and contractors have been unable to provide satisfactory responses, the business has taken decision that their services will not be procured. We continue to keep a record of all returns.

Our sub-contractor and supply chain Terms and Conditions have also been updated and where applicable, we require our contractors to warrant to us that their operatives on site hold a valid Construction Skills Certificate Scheme (CSCS) card.

### **3. Staff Recruitment**

We have continued to actively enforce our policy on recruitment, which ensures that upon commencement of employment, we check that all employees are eligible to work in the UK

and that they know their rates of pay, working hours, holiday entitlements and any other benefits.

For employees requiring additional training to gain a CSCS card, it has been agreed that a phased roll-out plan will be introduced in this financial year. It is anticipated that the required training will be completed through completion of an NVQ and over the next 12 months we aim to have all relevant site managers, assistant site managers and trainee assistant site managers working through an appropriate NVQ to provide the necessary evidence for a CSCS card. This will form part of the future recruitment requirements.

#### **4. Staff Training and Induction**

We have rolled out a mandatory modern slavery e-learning module to all employees, which provides training on how to identify, manage and prevent modern slavery within the workplace. This is repeated every three-years; and we continue to monitor compliance on a regional basis.

We have improved our induction process with the introduction of an enhanced Employee Handbook, which contains our Anti-slavery policy and related information. New Employees to the company are now required to undertake the aforementioned training module within their probationary period and are also asked to sign an authorisation form to confirm their understanding and acceptance to the Anti-Slavery Policy. Failure to do so will impact whether they 'pass' their probation.

#### **5. Staff Awareness**

We have increased the number of internal communications released to the business; including how issues or suspicions can be reported, and important reminders about the risks of modern slavery within the workplace. We continue to ensure that all new office buildings and site offices display posters on company notice boards. Through the internal audits we have carried out in the year, we are able to confirm that posters are displayed in all site offices.

#### **6. Internal Audits**

We have introduced regular anti-slavery audits of all our development sites. The audits involve one-to-one discussions with our site managers; spot-checks on contractors and assurances that sites are displaying anti-slavery posters and whistleblowing contact details.

### **Effectiveness of our processes**

In line with our policy, we expect all employees to remain vigilant in their day to day working and we expect employees to report any concerns that they have. Management are expected to take appropriate action where a concern is raised. Where we identify an issue with a supplier or sub-contractor, we will discuss the issue with them and agree what actions are to be taken. We will then monitor these actions on an ongoing basis.

**James Thomson  
Chief Executive Officer  
MJ Gleeson plc  
30 November 2021**