

# Schedule 41 Anti-slavery and human trafficking policy

Revision date March 2021 (Approved by the Board Nov 2016)



## 1. Policy Statement

- 1.1. 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.
- 1.2. 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 (the "Act"). 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.
- 1.3. 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.
- 1.4. This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. Responsibility for the policy

- 2.1. The Executive 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.
- 2.2. We have an established Modern Slavery Group which reports directly into the Executive Directors, and which consists of:
  - (A)
    - 2.2.1. The HR Director, Beth Broughton
    - 2.2.2. The Group Commercial Director, Simon Utley

2.2.3. The Head of Legal and Company Secretary, Leanne Johnson

2.2.4. The Head of Health and Safety, Nathan Preston.

2.3. The Modern Slavery Group has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.4. Management 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.

2.5. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Head of Legal and Company Secretary.

### **3. Compliance with the policy**

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

3.2. 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.

3.3. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4. 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. You can [report](#) these internally through the whistleblowing reporting mailbox: [speakup@mjgleeson.com](mailto:speakup@mjgleeson.com); or externally through our independent whistleblowing helpline: SeeHearSpeakUp on **0800 988 6818** or [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk).

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

3.6. 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 chains constitutes any of the various forms of modern slavery, raise it with your manager or the Legal Department.

- 3.7. 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 Head of Legal and Company Secretary or the Head of Human Resources 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 within our Employee Handbook which can be accessed via IRIS or our Intranet site, Gleegle.

#### **4. Communication and compliance with this policy**

- 4.1. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 4.2. All of our suppliers and contractors must answer a number of questions relating to their compliance with the Act as part of the pre-qualification questionnaire. Any failure to complete the questions, or any answers given that indicate the supplier or contractor is not compliant with the Act, must be notified to the Group Commercial Director.
- (B)
- 4.3. We reserve the right to conduct unannounced modern slavery audits on all our development sites, and report the findings to the MJ Gleeson plc Board of Directors. These audits require the full co-operation of all persons working for or with us, including our suppliers and contractors, and failure to co-operate will be a breach of this policy.

#### **5. Breaches of this policy**

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