

Modern Slavery and Human Trafficking Policy Statement

We are a civil engineering, building and groundworks company based in the Midlands and operating throughout the UK supporting the country's largest construction companies. Essentially, we are a family-founded business that is values driven and managed as a professional corporate entity; underpinned by continued investment and a customer-centric focus. Indeed, we believe that most values are relevant but the single one we wish to emphasise is "**Integrity**" which represents a concept of consistency of actions, values, methods, measures, principles, expectations, and outcomes.

Slavery and human trafficking remains a hidden affliction globally. This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps aimed at ensuring that there is no slavery or human trafficking within our business or our supply chains. This statement relates to actions and activities during the financial year 1st November 2015 to 31st October 2016.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We realise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse. Therefore throughout this statement we use the terms 'slavery and human trafficking' to encompass all these various forms of coerced labour.

1) Organisation Structure and Supply Chains

Applicability - This statement covers the activities of McDermott Building & Civil Engineering Ltd (trading as McDermotts.)

Scope - This statement covers our activities in the construction industry.

Country of operation and supply - We operate in the United Kingdom.

Overall risk - The overall risk of slavery and human trafficking within our immediate supply chain (all based in the UK) is deemed low.

Responsibilities - The overall responsibility rests with the Managing Director for setting and maintaining the policy and interventions. Special responsibilities are assigned as follows:

- Supply chain - Commercial Director
- Labour/agencies - Financial Controller

2) Policies

We have a range of complementary policies including:

- HR policies which can be found in the Employee Handbook
- Equality policy statement
- Sustainable procurement policy statement
- Ethical code of conduct statement

In the year we plan to evolve our whistleblowing and ethical sourcing policies.

3) Due Diligence

We are certified to ISO9001, ISO14001, OHSAS18001, and Achilles Building Confidence. Due diligence controls within our business management system includes:

Procedures

- Recruitment procedure
- Agency procedure (selecting/appointing agency)
- Purchasing procedure (selecting/appointing supplier)
- Subcontractors procedure (selecting/appointing supplier)
- Procedure for reporting concerns and the protection of whistleblowers

Documents

- Subcontractor terms and conditions
- Supplier terms and conditions
- Labour agency terms and conditions
- HR starter pack
- Labour agency terms and conditions

In the next year we will formalise an assessment methodology for our immediate supply chain.

4) Performance Indicators

We have reviewed our performance indicators in light of the introduction of the Modern Slavery Act 2015. The relevant performance indicators identified are:

- 100% training for Board, procurement and HR by the end of October 2016
- 100% of supply chain to complete an appropriate assessment on modern slavery and human trafficking
- 100% output of CSCS card audits identifying illegal workers within the supply chain of our project sites

5) Effectiveness

There were no reported instances of slavery and human trafficking relating to our immediate supply chain within the period 1st November 2015 to 31st October 2016. We will continually enhance the effectiveness of our slavery and human trafficking due diligence processes.

6) Training and Awareness

Whilst performance indicators exist for relevant personnel within the company, our organisation will also:

- Incorporate modern slavery and human trafficking into our corporate and project site induction programmes
- Develop a McDermotts specific awareness module to roll out across the business
- Incorporate modern slavery and human trafficking into supply chain forums

This policy is publicly available to all interested parties through a link on the home page of our website and will be reviewed and updated at the end of the next financial year (by end October 2017.)



Malcolm McDermott
Managing Director

Date: October 2016