



# MODERN SLAVERY POLICY

Last Updated May 2019

## Introduction

This statement is made on behalf of Munnelly Group Plc (company number 05475234) and its subsidiary companies (together “Munnelly”) in accordance with the obligation to make a modern slavery statement (Statement) under s54(1) of the Modern Slavery Act 2015.

Munnelly is a market leading construction and infrastructure support services group with headquarters in London, in the United Kingdom. Through our various subsidiaries we provide an array of support services to the construction and infrastructure sectors including, but not limited to, fatigue risk management, site access control, security, plant operations, vertical transportation solutions, work rostering, logistics management, pre-construction planning, delivery management, traffic management, waste management, operative supply, HR and recruitment services, payroll and invoicing solutions, worksite management and software solutions. We engage over 1,500 people throughout the UK.

This Statement sets out the steps Munnelly has taken during the 2017 financial year to ensure slavery and human trafficking is not taking place in our businesses or our supply chains. It reflects the progress that we have made on the actions we set out in our 2017 statement and looks ahead to the steps that we may take in the coming year.

Munnelly has high ethical standards and we expect our employees and those we do business with, including our suppliers and subcontractors, to meet the same high standards. Modern slavery is a crime and an abuse of human rights. It is outlawed in the UK Modern Slavery Act by the offences of slavery, servitude and forced or compulsory labour and human trafficking. We do not tolerate such abuses in our businesses or supply chains.

## Group policies

Our Ethics and Values Statement continues to set out the minimum standards that we expect from our employees and anyone acting on our behalf. It includes specific reference to the UK Modern Slavery Act and related offences, and requires adherence to the United Nations Global Compact’s ten universal principles which include the elimination of all forms of forced and compulsory labour. In the last year, we have updated our Ethics and Values Statement to include, amongst other things, further explanation of our approach to anti-slavery.

We encourage the reporting of any potential wrong doing through our Whistleblowing Policy. We continue to promote awareness and use of the Whistleblowing Policy and have also developed a clear internal reporting structure to ensure that all reports are dealt with efficiently, effectively and consistently.

## **Our businesses**

Our businesses around the world are subject to review by our internal audit function and all employees are aware of and have access to the updated Whistleblowing Policy. We are not aware of any potential modern slavery issues or indicators of such issues at any of our locations.

## **Our supply chains**

We have a global supply chain for goods and services that supports our businesses around the world. This includes the suppliers that produce the components for our products. We recognise that we continue to have suppliers in countries that are identified as high risk for modern slavery (based on the Global Slavery Index).

## **Risk assessment and due diligence**

Whilst we are not aware of any modern slavery in our supply chains, in our last statement we committed to reviewing our Group supplier due diligence process for prospective and existing suppliers to create a consistent Group wide process. To this end, we said we would undertake a supplier survey with specific reference to modern slavery issues. We have undertaken that supplier survey and are now analysing the results and considering how best to utilise that information in developing our anti-slavery measures.

Consistent with the UK Government guidance on the Modern Slavery Act, we are also considering a review of the country, sector, transaction and business partnership modern slavery risks to help Munnelly to better understand and appropriately target any modern slavery risks in its supply chains.

## **Monitoring**

We are currently reviewing the monitoring process and software solution to identify potential improvements.

## **Legal compliance**

We require our suppliers to comply with the laws and regulations applicable to them and to meet minimum standards in relation to human rights, employment practices, health and safety and the environment. We also expect our suppliers to check that their sub-suppliers comply with the laws and regulations applicable to them and meet the same minimum standards. If evidence is uncovered of any unacceptable practices then we would investigate and take appropriate steps in response. This may include helping a supplier to improve their operations and treatment of workers, and engaging with trade organisations, law enforcement authorities or other organisations to remedy the situation. We may cease to use a supplier or sub-supplier until we are satisfied that the issue has been addressed in a satisfactory way.

## **Contractual compliance**

In the last year, we have completed a review of our UK Standard Terms and Conditions of Purchase, and updated the drafting to include specific reference to modern slavery and to a new Supplier Code of Conduct. The Supplier Code of Conduct and the Standard Terms and Conditions of Purchase

have been published on our external website in English and are being translated into other relevant languages. The updated terms and conditions are also being amended for use in jurisdictions outside the UK. We are considering further steps which we may take to further embed the Supplier Code of Conduct in our procurement processes.

## **Training**

In 2019, we are committed to introducing training for Managers and strategic procurement teams. We will work with our People Team to develop an appropriate training module for modern slavery. The roll out of this will be completed during 2019.

This statement has been approved by the boards of Munnelly Group Plc and every subsidiary in our Group as defined by section 1152 Companies Act 2006.

A handwritten signature in black ink, appearing to read 'Gareth Brewerton', with a long horizontal line extending to the right.

**Gareth Brewerton**  
General Counsel & Company Secretary  
Munnelly Group Plc.