



## 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 2020 as approved by the Board on 11 September 2020.

This statement reports on our organisation and businesses, policies, 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 – housebuilding and strategic land trading. 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 strategic land 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.

Our policy on recruitment 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. Other than apprentices, all employees receive, at least, the minimum recommended by the Living Wage Foundation and statutory holiday allowance.

Our policies for engaging with a new supplier require them to confirm they have appropriate policies and procedures in place to manage their and their supply chain risks.

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**

### **1. Supplier Due Diligence**

To ensure that all those in our supply chain and our contractors comply with our values we have in place a questionnaire, which is sent to all new suppliers and contractors, as part of our prequalification process. Where suppliers and contractors are unable to provide satisfactory responses, their services will not be procured. From September 2020, this will be issued to all of our supply chain and contractors on an annual basis. We continue to keep a record of all returns and scan all returns onto our intranet.

### **2. Staff Training**

Training is carried out on a risk-based approach. The HR Department, Build Managers, Site Managers and Assistant Site Managers, all receive annual training on "spotting the signs" of modern slavery. From September 2020 all employees will be required to complete an e-learning training module on modern slavery in the workplace.

New employees to the company are encouraged to read the existing policy which is part of the Group's Employee Handbook and included on our intranet site. We ask all new employees to sign an authorisation form to confirm their understanding and acceptance to the policy which is passed to them as part of their company induction.

### **3. Staff Awareness**

We regularly release internal communications and reminders about the risks of modern slavery, including through our Group weekly newsletter and on company notice boards both in head offices and on site.

### **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**

**2 November 2020**