



MODERN SLAVERY STATEMENT

Version 7

Revision Date: June 2021

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1. MODERN SLAVERY POLICY

We know that Modern Slavery is a growing issue, that it exists in every country in the world and in every type of economy; no sector, industry or region is safe from the risk. Our commitment to understanding modern slavery risks and our zero tolerance for modern slavery is reflected in our Modern Slavery Policy. We will act ethically, transparently and with integrity in our business dealings and relationships to endeavour to ensure that there is no modern slavery within our own business or within our supply chain.

Our Policy will be reviewed annually or sooner if we feel a change of circumstances should lead to a review. The Board of Directors has responsibility for ensuring that the Policy complies with the company's legal and ethical obligations.

2. ORGANISATION STRUCTURE AND SUPPLY CHAIN

M.V. Kelly Ltd is a specialist infrastructure, groundworks and civil engineering company covering most of the UK. Our supply chain comprises material suppliers, plant hire, and subcontractors consisting of labour only, labour/ plant, and labour/ plant and materials. We also engage suppliers for professional services such as accountants, insurance and consultants.

All our operations and activities are UK based. We do not have any seasonal workers. We have a centralised procurement team based at our head office.

3. DUE DILIGENCE & RISK ASSESSMENT

Our main risk for modern slavery is from our subcontractors and suppliers. To deal with this challenge, we build lasting relationships with likeminded subcontractors and suppliers who share our commitment to understanding and tackling modern slavery. We have a stringent process in place which is managed daily by our financial team whereby all new suppliers / sub-contractors are required to confirm the steps that they take to against the risks of modern slavery within their work force/ supply chain.

We will not work with suppliers and subcontractors who are unwilling to confirm compliance with the Modern Slavery Act. We will act if suppliers and subcontractors are not prepared to make necessary improvements where appropriate.

We aim to reduce the risk of modern slavery by:

- Understanding that Modern Slavery risks continue to evolve; we absolutely cannot stand still on this issue
- Ensure we are informed by staying abreast of guidance and information available such as the 2020 UK Annual Report on Modern Slavery and It Still Happens Here (the Centre for Social Justice)
- Communicating our Modern Slavery Policy to all staff, suppliers and subcontractors when entering into new or renewed contracts with them
- Using training and regular updates to ensure that staff are aware of what modern slavery might look like and to be vigilant about it
- Requesting Suppliers and subcontractors to provide evidence of their own policies and compliance as appropriate

- Terminating our relationship with a supplier or sub-contractor if they fail to comply with the Modern Slavery Act 2015 or to improve if an issue is identified
- Monitoring potential risk in our own business and supply chains
- Providing adequate protection for whistle-blowers as assured in our Whistleblowing Policy

We take our policy and the underlying principles very seriously. A breach of our Policy will result in an employee facing disciplinary action which could result in dismissal and the potential for removal from our approved supply chain for suppliers/ subcontractors.

4. MEASURING EFFECTIVENESS

M.V. Kelly Ltd remains low risk and we have not identified any modern slavery or human trafficking within the financial year 2020 – 2021 within the company or within our supply chain. We continue to monitor and work with suppliers and sub-contractors on compliance. Our current processes are felt to be effective however we will continue to educate staff about what modern slavery may look like in the UK as the risk, and our understanding of the risk continues to grow.

5. TRAINING

All new staff are trained in our Policy and processes as part of their induction. Staff involved in monitoring the supply chain receive further training within their department. Updates to policy and training are issued to all staff as they occur.

Through our training we enable employees to understand modern slavery outside the workplace and to spot the signs and we encourage ethical choices and reporting of any concerns. We all have a responsibility to be alert.

6. SIGN OFF

This statement covers the period 1st June 2020 to 31st May 2021. It was approved by the Board of Directors on 15th June 2021 and signed by the HR Director on behalf of the Board on the same day.

Signed; *Julie Kelly*

(For & on behalf of the Board of Directors)

Name & Position; Julie Kelly HR Director

Date; 15/06/2021