



MODERN SLAVERY STATEMENT

Version 5

Revision Date: 25/11/19

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## 1. MODERN SLAVERY POLICY

Our commitment to understanding modern slavery risks is reflected in our Modern Slavery Policy. In accordance with the Modern Slavery Act 2015 we will act ethically, transparently and with integrity in our business dealings and relationships 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 overall responsibility for ensuring that the Policy complies with Company's legal and ethical obligations; Julie Kelly (HR Director) has day to day responsibility for implementing the Policy.

## 2. ORGANISATION STRUCTURE AND SUPPLY CHAIN

MV Kelly Ltd is a specialist infrastructure, groundworks and civil engineering Company covering most of the UK. We have a large and varied supply chain. Our supply chain is comprised of material suppliers and sub-contractors, which include labour/ labour only/ labour/plant and materials and the purchase and hire of plant. We also engage suppliers for professional services such as accountants, insurance and consultants.

All our operations and activities are UK based. We have a centralised procurement team based at our head office. MV Kelly Ltd is committed to ethical trading and has zero tolerance for modern slavery.

## 3. DUE DILIGENCE & RISK ASSESSMENT

Our main risk for modern slavery is from our sub-contractors and suppliers. To tackle this, we build lasting relationships with likeminded sub-contractors 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 ensure that no modern slavery exists 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:

- Communicating our Modern Slavery Policy to all staff, suppliers and sub-contractors 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
- Understanding that Modern Slavery risks continue to evolve; we cannot stand still on this issue
- 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

MV Kelly Ltd is low risk and we have not identified any modern slavery or human trafficking within the financial year 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.

#### 6. SIGN OFF

This statement covers the period 1<sup>st</sup> June 2018 to 31<sup>st</sup> May 2019. It was approved by the Board of Directors 25<sup>th</sup> November 2019 and signed by the HR Director Julie Kelly on behalf of the Board on the same day.

Signed;

