



Modern Slavery Statement 2017 - 2018

Introduction

This statement sets out MJ Church's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

As one of the largest Civil Engineering, Earthworks and Waste Management Contractors in the South West, MJ Church recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

MJ Church is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

MJ Church Ltd operates from three main sites in the Wiltshire area and from a further three waste transfer stations within a 25m radius. The company is engaged in civil engineering projects across the south of the country employing its own management and site operations personnel and also employs a large sub-contract labour force, typically closer to the location of the various projects it undertakes. The civil engineering contracting division works with a pre-selected base of construction industry sub-contractors and consultants. Waste management operations are deployed from the company's Waste Transfer Stations. Plant and Transport are deployed across the region to support the civil engineering and waste activities; the company has an extensive asset base of commercial vehicles, plant and associated equipment. Waste Management is also operated nationwide via a brokerage with pre-selected skip hire/waste management partners. An organisational structure chart can be found at the end of this policy.

The company works with a varied and large supply chain covering contractors, consultants, advisors, recruitment and labour agencies, product supplies including plant and commercial vehicle manufacturers, material providers, service providers and charities as well as our client base which includes both public and private sector organisations.

Countries of operation and supply

The company works almost solely in the UK, however limited waste supply chains are in place in China, Vietnam, the Netherlands, Germany and Poland.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

In the past year we have increased our focus on Modern Slavery within our business operations and the supply chains. We have mapped our supply chains to assess particular industry/sector and geographical risk. These assessments cover the entire scope of our business, encompassing civil engineering contracting in the UK, waste operations in the UK,

Waste Recycling operations abroad as well as product supply chains particularly where goods are imported i.e. plant equipment and parts suppliers.

We have worked with external experts to undertake a detailed risk analysis of our sourcing countries and product areas so we have a clear idea of where the biggest risks lie and where our actions can have a positive impact.

In terms of understanding our greatest risk, we understand there is potential risk in the following areas:

- extraction of metal used in vehicles purchased from original-equipment manufacturers
- extraction of rubber in tyres used in commercial fleets; extraction of metal and minerals used in electronic equipment such as computers, tablets and telephones, pda's and satellite surveying equipment and assembly of same
- building materials, particularly when imported.

This has enabled us to prioritise our supply chain due diligence on Modern Slavery when procuring such items.

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- The UK Construction Industry is the 6th most prevalent sector for labour exploitation, however due to the subcontracting nature of the industry we are aware that exploitation can very easily be hidden from the company as a Main/Principal Contractor.

Responsibility

Responsibility for MJ Church's anti-slavery initiatives is as follows:

- **Policies:** The Board of Directors are responsible for the implementation and updating of MJ Church's policies with support and advice from our Procurement, Human Resources, Finance, Quality and Operations Departments.
- **Risk assessments:** As part of any capital expenditure the company follows a strict procurement procedure which includes a Modern Slavery Audit on the Supplier/s; as part of pre-lets and becoming an MJ Church Supplier a Modern Slavery audit is undertaken alongside the Health & Safety, financial and Quality audits – this includes recruitment and labour suppliers.
- **Investigations/due diligence:** MJ Church Contracting Division Commercial team of surveyors who procure sub-contractors, buyers across the company and department managers are all required to undertake Modern Slavery Audits alongside other audits.
- **Training:** The company is undertaking a programme of eLearning for all managers and buyers within the business, with a number of personnel being trained as Champions.

Relevant policies

MJ Church operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy:** MJ Church encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report these to the Company Secretary.
- **MJ Church Code of Ethic:** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Subcontractor/Suppliers code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
 - We have updated our pre-qualification questionnaires (part of our process for accepting suppliers and subcontractors onto our approved supplier list) to include specific questions on modern slavery and human trafficking to understand the approach taken. The responses are reviewed by our management team;
 - we have updated template commercial agreements and subcontract conditions to include an obligation on suppliers and subcontractors to comply with the Act and ensure that their suppliers and subcontractors will too.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;

- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking
- using alternative sustainable products and services where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring management and purchasing staff to have completed training on modern slavery by end of 2018.
- reviewing its existing supply chains, some 1,700 suppliers, in the same way as new suppliers by end of 2018.

Training

The organisation requires that all managers, HR professional and procurement staff to have undertaken the modern slavery training by end of 2018

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by issuing toolbox talks, the companies means of Health & Safety communications tool, on:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to read 'Ben Staff', with a long horizontal flourish extending to the right.

Director's name:

Ben Staff

Date:

23/2/18

MJ Church Company Structure

