









- **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 behavior 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, 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.

## 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 has:

- 1) Organised for management, recruitment and purchasing staff to have completed a one day CPD certified Modern Slavery training course run in August 2019 by Peel Solutions / A Plus Safety & Training
  - 2) Issued a Modern Slavery ToolBox Talk to all staff which has been read and acknowledged
- 3) Continually reviewed its existing supply chains (some 1,700) in the same way as new suppliers



## Training

The organisation requires that all managers, HR professional and procurement staff undertake the modern slavery training.

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.

**Group Managing Director's signature:**

**Group Managing Director's name:** Ben Staff

**Date:** November 2020



MJ Church Group Organisational Structure

