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# Modern Slavery Policy Statement IMS P 010

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July 2022

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OWNER: BUSINESS SERVICES | ISSUE NO. 2



## Introduction

This policy 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 in relation to s.54 of the Modern Slavery Act 2015 and for the financial year 1 October 2021 to 31 September 2022.

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 exclusively in the UK.

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.



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 6<sup>th</sup> most prevalent sector for labour exploitation. 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, Business Services, Quality and Operations Departments.
- **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 training alongside other regular 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. All staff will receive TNT's (Tool Box Talks) on Modern Slavery Awareness.

### 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, alternatively there is a confidential phone line in place.



- **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.

### Performance indicators

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

- requiring relevant management and purchasing staff to have completed training on modern slavery by end Q4 2022.

### Training

The Organisation requires that all relevant Managers, HR professional and procurement staff to have undertaken the Modern Slavery training by the end of Q4 2023.

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 two of the organisation's board of directors, who will review and update it annually.

## Group Managing Director's signature:

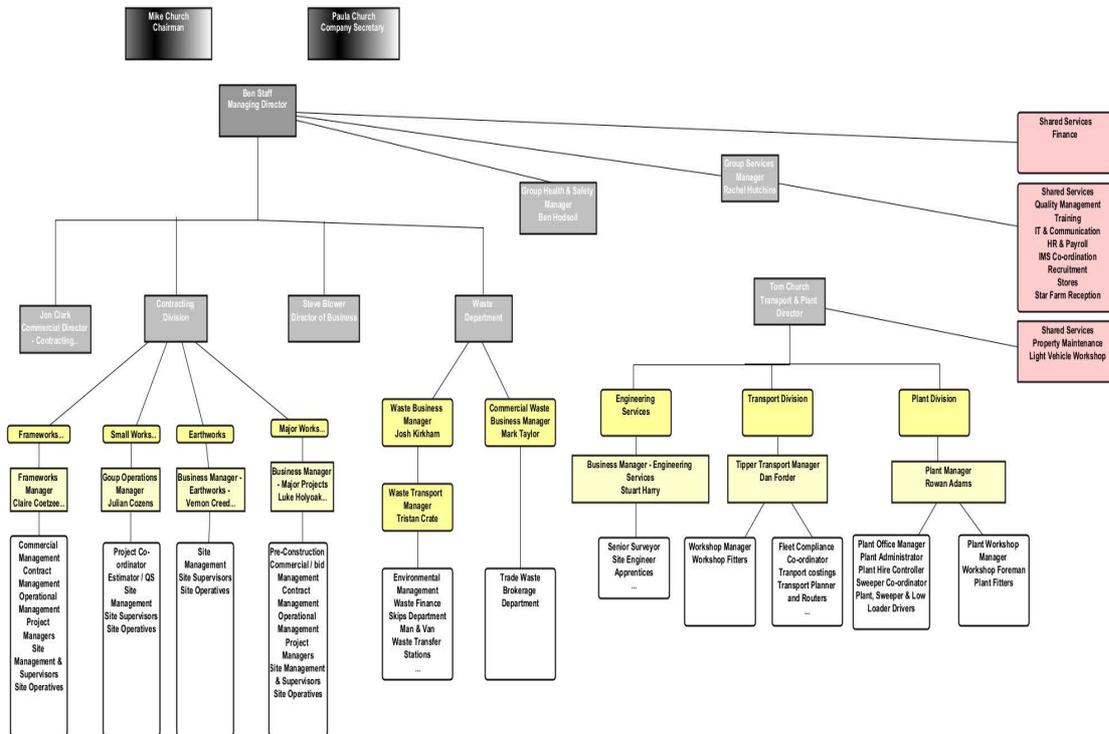
**Group Managing Director's name:** Ben Staff

**Date:** 13/07/2022

**MJ Church Group Organisational Structure**



## MJ Church Company Structure



IMS R 001