



## Modern Slavery Policy Statement IMS P 010

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### APPENDIX A      Organisation chart



### Introduction

This policy statement sets out the actions MJ Church (Plant) Ltd [*hereinafter “MJ Church”*] undertakes 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 or its’ supply chains.

This statement relates to actions and activities in relation to section 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.

### Organisation structure and supply chains

MJ Church operates from three main sites in the Wiltshire area and from a further three waste transfer stations within a 25m radius. The company is divided into three main divisions:

- The **civil engineering contracting** division works with a pre-selected base of construction industry sub- contractors and consultants. 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.
- **Waste management** operations are deployed from the company’s Waste Transfer Stations and via a nationwide brokerage network with pre- selected skip hire/waste management partners.
- **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.

An organisation chart can be found in Appendix A.

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.



## Our approach to Modern Slavery

In the past year we have increased the focus on Modern Slavery within our business operations and associated 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 UK Construction Industry is ranked 6th on the list of sectors most likely to feature/be guilty of 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.

### Responsibilities

Responsibility for the company'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 subcontractors, buyers across the company and department managers are all required to undertake Modern Slavery training alongside other regular audits.

### Training

The company's modern slavery training covers:

- our purchasing practices, which influence supply chain conditions and 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 company; and
- what steps the company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the company's supply chains

### Awareness-raising programme

The company is undertaking a programme of eLearning for all managers and buyers within the business, with several personnel being trained as Champions.

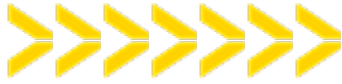
As well as training staff, the company has raised awareness of modern slavery issues by issuing toolbox talks, the company's means of Health & Safety communications tool, on:

- 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.

### 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 company'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 Ethics:** The company's code makes clear to employees the actions and behaviour expected of them when representing the company. The company 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 company 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 company works with suppliers to ensure that they meet the standards of the code and improve their employees' working conditions. However, serious violations of the company'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) and now:

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

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

**Group Managing Director's signature:**

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

**Date:** 09/08/2022



## APPENDIX A

### Company organisation chart



