

Modern Slavery and Human Trafficking Statement

Introduction

At MJ Gleeson plc we are committed to maintaining the highest ethical standards in all our relationships across all our businesses. Our reputation is extremely important to us and is built around us maintaining these standards.

MJ Gleeson plc and its subsidiaries (the “Group”) recognise modern slavery and human trafficking as an important human rights issue and we are committed to taking appropriate and proportionate steps to ensure human rights are fully upheld within our Group and within our supply chain.

This statement reports on our organisation and businesses, policies, due diligence procedures, risk assessment, effectiveness of measures taken and training. This statement is updated on an annual basis.

Our business

The MJ Gleeson plc group undertakes two principal activities – housebuilding and strategic land trading. These activities are carried out by a number of trading entities over numerous sites / locations, all of which are in the UK.

- (i) As our housebuilding activity is labour and material intensive there is a risk both from sourcing materials and the engagement of labour. All our activities are UK based and the majority of our materials come from UK suppliers who must comply with the Act. We are however, aware that our suppliers may source materials outside the UK. We are also aware that while the majority of our employees and sub-contractors are UK nationals we will also employ or contract with non-UK nationals where the risk of modern slavery may be higher.
- (ii) Our strategic land business employs a small number of professional / office-based staff and its suppliers are principally professional consultancy businesses. It does not purchase any materials and therefore has a short and limited supply chain.

Our policies

We have a Group policy on modern slavery and human trafficking. All employees are made aware of this through our employee handbook and on our intranet.

We ensure that on commencement of employment all employees are eligible to work in the UK and that they know their rates of pay, working hours, holiday entitlements and any other benefits. Other than apprentices, all employees receive, at least, the minimum recommended by the Living Wage Foundation and statutory holiday allowance.

Our policies for engaging with a new supplier require them to confirm they have appropriate policies and procedures in place to manage their and their supply chain risks.

Our Compliance Manager, who reports directly to the CEO, manages the actions in respect of this statement.

Steps Taken

Over the last 12 months we have continued to issue letters to new suppliers and sub-contractors to the business ensuring that they complete and sign the pre-qualification document, which includes the modern slavery testimony, before we agree to deal with them. Reminder letters are sent out if no response is received and suppliers and sub-contractors risk not providing their services to the company if they fail to respond.

Where there is a risk or concern identified, then we will ask those trades to provide relevant identification and information to support their employment. Suppliers and sub-contractors risk not providing services to the company if satisfactory evidence cannot be provided.

Whilst over the last 12 months we have continued to write to suppliers and subcontractors as part of the pre-qualification process, we recognise that our risk assessment and on-site audit procedures have not operated as fully as intended so more will be done in 2020 in carrying out these risk assessments and audits and recording the findings.

Ongoing training is carried out on a risk-based approach. Build Managers, Site Managers and Assistant Site Managers are most likely to spot issues and for this reason they are all trained on what to look out for. Refresher training is carried out on an annual basis with existing employees and new employees to the company are encouraged to read the existing policy which is part of the Group's Employee Handbook and included on our intranet site. We ask all new employees to sign an authorisation form to confirm their understanding and acceptance to the policy which is passed to them as part of their company induction.

Our HR Department have received training on modern slavery relevant to the construction industry and we have recently updated all our employees on 'spotting the signs' in our weekly newsletter. These updates will continue in 2020 with internal communications and reminders, including on company notice boards and all site notice boards.

Effectiveness of our processes

In line with our policy, we expect all employees to remain vigilant in their day to day working and we expect employees to report any concerns that they have. Management are expected to take appropriate action where a concern is raised. Where we identify an issue with a supplier or sub-contractor, we will discuss the issue with them and agree what actions are to be taken. We will then monitor these actions on an ongoing basis. Suppliers and sub-contractors risk not providing services to the company if the agreed actions are not taken.

The Group has a "whistleblowing" procedure which allows concerns to be reported on a confidential basis and without fear of recrimination.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the current financial year ended 30 June 2020 as approved by the Board on

James Thomson
Chief Executive Officer
MJ Gleeson plc

26 November 2019