

Modern Slavery & Human Trafficking Statement

INTRODUCTION

This statement sets out M Group Services' actions to understand all potential modern slavery risks related to the Group and its operating businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within the Group and our supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

As part of the Utilities, Telecom, Transport and Data sectors, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The Group is absolutely committed to preventing slavery and human trafficking in all its activities and ensures that its supply chains are free from slavery and human trafficking.

ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

This statement covers the activities of M Group Services.

The Group is privately owned and delivers a range of essential infrastructure services within the utilities sectors (electricity, gas and water), transport, telecom and data capture in the UK and Ireland. The Group's supply chain is primarily based in the UK and provides aggregates, gas and water pipes and components, electricity and telecom cables, substation components and telecom equipment. In addition, the company makes extensive use of a range of subcontractors from labour only to fully serviced labour, plant and equipment providers responsible for service delivery. A number of our clients supply materials to us directly on a free issue basis which they are responsible for sourcing via their own supply chain partners.

COUNTRIES OF OPERATION & SUPPLY

The organisation currently operates in the following countries:

- United Kingdom and Ireland.

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

- A review of our supply chain partners including their country source of materials and labour in support of our business operations. As we are operating exclusively in the UK and Ireland with the majority of our supply chain partners also based in the UK, we consider the overall risk of slavery and/or human trafficking to be very low.
- For all directly employed employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of National Minimum and National Living Wage.

- For all indirect workers we carry out a Health & Safety and Contract Familiarisation induction prior to their commencement of work at which we are able to check their identity, qualifications and competence
- We co-operate with our clients through regular client audits of our obligations under this policy, and undertake to support the client through effective supply chain management.

RISK ACTIVITIES

We have conducted a risk assessment of our supply chain activities across the business including those overseas countries where there is considered to be a material risk of slavery or human trafficking.

Where we have identified a material risk we have conducted supply chain assessment audits to ensure compliance with the agreed policies. We will continue to monitor our supply chain partners and conduct assessment audits where we identify there is a potential risk of slavery or human trafficking.

M Group Services runs a vigorous supply chain process, which includes compliance checks, to ensure our partners meet or exceed our modern slavery and human trafficking policy requirements. During 2019/20, 645 partner organisations have completed the process and gained M Group Services' approval.

RESPONSIBILITY

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** HR Director, Group Head of Procurement, Executive Director – Support Services
- **Risk assessments:** Procurement Director and HR Director supported by the Head of Group Insurance and Risk Management and Internal Audit Manager will assess the risk of slavery or human trafficking within the supply chain as part of the Company's overall Risk Management and Governance.
- **Investigations/due diligence:** The Internal Audit Manager is responsible for carrying out investigations supported by the HR Department and Group Commercial Department. The Procurement Department and Commercial teams are responsible for ensuring the Company's policies are communicated to the supply chain partners and form part of the supplier assessment process, which is managed by the Group Commercial Department.
- **Training:** All middle managers and above engaged in procurement activities and above with supply chain responsibilities will complete training/refresher training on business ethics and modern slavery and human trafficking during 2019/20.

RELEVANT POLICIES

The organisation 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:** The Group 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 use our confidential helpline provided by Expolink.
- **Ethical business code of conduct:** The organisation's code makes clear to employees the actions and behaviours expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Supply chain/Procurement code of conduct:** The organisation is committed to ensuring that its supply chain partners adhere to the highest standards of ethics. Partners 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 the supply chain to ensure that they meet the standards of the code. Serious violations of the organisation's code of conduct will lead to the termination of the business relationship. The M Group Services ethical business code of conduct forms part of the contractual documentation issued, and is made available to all supply chain partners during engagement. We also provide links to an "Extranet" site where suppliers and sub-contractors are able to access controlled documentation including the Ethical Business Code of Conduct.

As part of our supply chain evaluation, candidates are asked if they have a policy/statement that sets out the steps their organisation has taken during the financial year to ensure that slavery and human trafficking are not taking place in any of their supply chains or in any part of their own business.

If any potential supply chain partner is unable to demonstrate that they have a robust policy in place, we ensure that they agree to act in accordance with our policy.

Recruitment Policy: The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. The Company will undertake random audits of the agency HR and payroll records to confirm that workers have the Right to Work in the UK and are paid a rate of pay at or above the National Minimum Wage/Living Wage.

DUE DILIGENCE

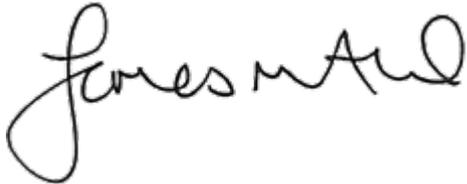
The organisation undertakes due diligence when considering taking on supply chain partners, and regularly reviews its existing partners. The organisation's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new partner.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where material risks are identified.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action appropriately.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or which seriously violate our supplier code of conduct, including the termination of the business relationship.

BOARD APPROVAL

This statement has been approved by the organisation's Operational Board who will review and update it at least annually.

Jim Arnold

A handwritten signature in black ink that reads "Jim Arnold". The signature is written in a cursive style with a large initial 'J' and 'A'.

Chief Executive

Dated: July 2020