

# MODERN SLAVERY STATEMENT



## Introduction from the CEO



The company maintains a commitment to respecting human rights, including the elimination of slavery and human trafficking in its supply chains and business operations. We welcome the transparency that the Modern Slavery Act encourages.

We seek to have the right policies, processes and procedures in place and foster an environment where respect for the individual and their rights is a core value. We encourage any individual who has concerns about unethical behaviour in any part of our business to speak up and do so without fear of retaliation.

Our statement sets out the steps that the company are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or in any part of our own business.

## 1. Organisation

This statement applies to The MCL Group (Int) Ltd and the divisions (referred to in this statement as ‘the Organisation’).

## 2. Organisational Structure

The Company exists to provide efficient and professional services to clients in a wide range of sectors - both public and non-public, nationally and internationally, whilst providing rewarding employment to its directly employed and contract staff.

The Organisation is dedicated to delivering tailor-made solutions for a wide-ranging set of operational challenges faced by organisations.

## 3. Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## 4. Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to The Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## 5. Supply Chains

In order to fulfil its activities, The Organisation main supply chains include those related to the supply of services to clients. As the company does not manufacture a physical product the volume of externally provided products and services are low.

The Organisation is a first-tier supplier and therefore has minimal further contractual relationships with lower-tier suppliers.

## 6. Potential Exposure

In general, The Organisation considers its main exposure to the risk of slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## 7. Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, The Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Recognition by the senior management team to address modern slavery and labour exploitation in the company's own operations and in its supply chain.

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- Whistle-blowing process gives guidance on reporting suspected instances of modern slavery and how to respond.
- Our rigorous recruitment process includes Right to work checks
- Our payroll process includes checks for multiple payments to the same bank account
- Procurement processes include anti slavery checks

## 8. Key Performance Indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in The Organisation or its supply chains.

- All staff required to have completed training on modern slavery at induction
- Conducting annual reviews of existing supply chain and carry out an evaluation all our existing suppliers
- Recruitment process audits
- Number of whistle blowing instances

## 9. Policies

The Organisation has the following policies which further define its stance on modern slavery; a corporate social responsibility policy; supplier code of conduct; recruitment policy.

## 10. Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, Thomas Birdsall, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to The Organisation obligations in this regard.

This statement is made in pursuance of Section 54 (1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.



Richard O'Donnell - CEO  
May 2018