

# **Mackley Policy**

**JTM-HR-33**

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## **Slavery & Human Trafficking Policy Statement**

**V8.8 – April 2023**

REV	CHANGES	ORIGINATOR	APPROVED BY BOARD
8.0	Updated for FY2022	TH	12 April 2023
7.0	Updated for FY2021	TH	13 May 2022
6.0	Updated for FY2021	RP	07 May 2022
5.0	Updated for FY2023	RP	01 June 2021

References to ‘the Company’ or to ‘the Employer’ are for JT Mackley & Co. Ltd and any subsidiary entities.

## Our Organisation’s Structure

Mackley is a provider of civil engineering services in the construction industry. We are a part of the Van Oord group of companies (Group), and our ultimate parent company is Van Oord NV which has its head office in The Netherlands located at Schaarwijk 211, 3063 NH Rotterdam. Mackley has around 120 employees and operates in the United Kingdom and, from time to time, other countries.

We have an annual turnover of between £35 and £45 million.

## Our Business

The principal activity of our company is construction and civil engineering.

## Our Supply Chain

Our supply chains include materials supplied by suppliers principally from the United Kingdom but we do have a small number of suppliers from various parts of the world.

## Our policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with our suppliers and subcontractors and our supplier appraisal requires evidence of each suppliers modern slavery policy.
- Where possible only use Companies that are ISO accredited.
- Anyone that doesn’t have the ISO accreditation, we audit.

## Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we take all reasonable and practicable steps to ensure that slavery and human trafficking play no direct or indirect part of our business.

We have in place general systems and controls to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.(Please also refer to JTM-HR-25 Safeguarding policy).
- Monitor potential risk areas in our supply chains through due diligence.
- Protect whistle-blowers. (please refer to JTM-HR-19 Whistleblowing Policy)
- Promote corporate social responsibility which recognises our wider social and environmental responsibilities.

## Supplier Adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of the routine training of applicable staff and the issuing of relevant policies and guidelines. We also assess new suppliers as regards anti-slavery and human trafficking practices or potential practices; We have a dedicated compliance team, which consists of involvement, where considered appropriate, from the following departments:

- QHSE.
- Audit and compliance.
- Human resources.
- Procurement department.

## Training

To ensure a good level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide appropriate training to our staff.

- E learning training provided to relevant staff about modern slavery issues, duties and responsibilities including reporting - every 3 years
- E learning training on Whistleblowing - duties, responsibilities and reporting

We are of the opinion that the systems and controls in place are reasonable and proportionate to the risks of slavery and human trafficking that may exist within our supply chain, and effective in ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2 January 2023.



B Hamer Managing Director  
J T Mackley & Co Ltd

April 2023