



Mackley Policy

JTM-HR-33

Modern Slavery & Human Trafficking Policy

VII – May 2026

**Engineering a
sustainable future**





Document Quality Control

REV	CHANGES	ORIGINATOR	APPROVED BY BOARD
11.0	Updated	JA, LB	MAY 2026
10.0	Updated for FY 2024. Supply Chain Sustainability School included.	TH	MAY 2025
9.0	Updated for FY 2023. Renamed.	TH	MAY 2024
8.0	Updated for FY2022	TH	APRIL 2023
7.0	Updated for FY2021	TH	MAY 2022
6.0	Updated for FY2021	RP	FEB 2022
5.0	Updated for FY2020	RP	JUN 2021
4.0			
3.0			
2.0			
1.0			

Scope

References to “the Company” or to “the Employer” relate to Mackley and this policy applies to all employees whether engaged directly or as subcontractors, agency staff, or consultants.

Policy Statement

This statement sets out J T Mackley’s actions 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 and its supply chains. This statement relates to actions and activities during the financial year 1 January 2026 to 31 December 2026.

As part of the construction and civil engineering sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation 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.

Organisational Structure and Supply Chains

This statement covers the activities of J T Mackley & Co Ltd:

- 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 230 employees and operates in the United Kingdom and, from time to time, other countries.
- We have an annual turnover of around £80 million.
- 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.

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

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

Due Diligence Processes for Slavery & 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.
- 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.

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Our HR Manager is responsible for reviewing and updating and implementing policies. Specialised websites and industry standards are followed.
- **Training:** Tool box talks are initiated and updated in line with annual review. 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:

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

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy.** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our 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 contact the HR department on 01273 492212 in confidence.
- **Employee code of conduct.** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier Appraisal.** We are committed to ensuring that our 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, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the highest standards. Supplier performance is monitored on a weekly basis and any concerns raised. However, serious violations of our supplier appraisal will lead to the termination of the business relationship. All suppliers are required to complete the appraisal if they do not have the relevant ISO accreditation. Our HSEQ department carry out external supplier audits to check against the completed supplier appraisal.

- **Agency workers.** We use only specified, reputable employment agencies to source labour and always verify their practices before accepting workers from that agency. It is a requirement on site for all workers to have the appropriate level of skill. Site supervisors check the workers against the CSCS cards to ensure that they have the required skill/qualifications to be on site. An example of workers being found with other people's photo ID was identified and the authorities were notified.

Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditor and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular being members of the Supply Chain Sustainability School (SCSS);
- using SCSS database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance Indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all supervisory staff to complete training on modern slavery every 2 years;
- Tool box talks to be delivered every 6 months on Bullying and Harassment and Whistleblowing.

Training

We require all staff within our organisation to complete our eLearning training on modern slavery as part of a wider education programme. This is repeated every 3 years.

We require all supervisory staff to complete an online training course every 2 years and there is a toolbox talk which is carried out every 6 months.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which 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 our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Raising Awareness Programme

As well as training staff, we have raised awareness of modern slavery issues by putting up posters across our premises.

The posters explain to staff:

- the basic principles of the Modern Slavery;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline (08000 121 700) or 101 local police if assessed to be a risk but not an emergency
- 999 if suspect emergency.

This policy has been approved & authorised by the Board on:

Individuals

To understand and adhere to all aspects of this policy

This policy has been approved and authorised by the Board on:



Name: B Hamer

Position: Managing Director

Date: May 2026



Mackley

www.mackley.co.uk



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