



Policy Statement

Modern day slavery and human trafficking remains a hidden blight on our global society. Modern day slavery is the term used to encompass slavery, servitude, forced and compulsory labour and human trafficking of all ages.

B. & M. McHugh Ltd has a zero-tolerance approach to modern slavery or human trafficking and is fully committed to preventing it in all its forms throughout our operations and in our supply chains. This commitment is integral to our values and ethical standards and aligns with the Modern Slavery Act 2015.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, managers, workers, agency workers, seconded workers, volunteers, interns, agents, sub-contractors, designers, external consultants, third-party representatives and business partners.

Commitment to Legal Compliance

B. & M. McHugh Ltd is fully committed to complying with the Modern Slavery Act 2015 and all relevant UK legislation related to labour rights and ethical business practices. We recognise our duty to prevent modern slavery and human trafficking in all aspects of our operations and supply chain.

We expect our suppliers, subcontractors and business partners to comply with the principles of the Modern Slavery Act 2015 and to operate effective controls to prevent modern slavery within their own operations and supply chains.

Policy Objectives

We aim to:

- Take a proactive approach to identifying and mitigating the risk of modern slavery.
- Ensure transparency in our business practices and supply chain activities.
- Provide awareness and training for staff on how to identify the signs of modern slavery and human trafficking.
- Establish mechanisms for reporting concerns safely and confidentially.

Achieving this Policy

B. & M. McHugh Ltd aims to achieve this policy by identifying and mitigating risk in the following, but not limited to, ways:

- Taking a zero-tolerance approach to slavery and human trafficking in our business and supply chain, with a focus on our business activities and supply chain vulnerabilities;
- Enhance vetting via an enhanced prequalification and renewal processes and investigation of our supply chain;
- Through training, alerting staff to the risks, however small, in our business and in the wider supply chain;
- Review training materials annually and target high-risk roles such as procurement, site management, and HR.
- Expecting and encouraging staff to report concerns to management and the protection of whistleblowers (see BMH/GN/KP2/08 Whistleblowing Guidance);
- Continually audit and review company procedures in the recruitment, right to work checks and pay of all staff.

Policy Communication

This policy is communicated to all employees and made available to all supply chain partners. We require that our subcontractors and suppliers acknowledge and agree to uphold the principles of this policy. It forms part of our contractual and prequalification processes.

Prohibited Practices

We explicitly prohibit practices known to increase the risk of modern slavery, such as withholding of identity documents, charging recruitment fees to workers, coercion, or restriction of movement. We require our suppliers to do the same.

Due Diligence and Response to Incidents



We conduct enhanced vetting and ongoing assessment of our supply chain. If an instance or suspicion of modern slavery is identified, we will take immediate steps including reporting to the relevant authorities, suspending the relationship, and working with affected individuals to ensure their protection and remediation.

High-Risk Labour and Material Sourcing

We assess and monitor our supply chain for high-risk sourcing of labour and materials, particularly where recruitment occurs through third-party agencies or involves overseas labour. Additional due diligence steps are applied in such cases.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Concerns regarding potential modern slavery should be reported through line management or via the Company Whistleblowing arrangements.

Responsibility for this Policy

The Managing Director is the Director responsible for the implementation of the policy, together with each Director and Manager within their own realm of responsibility. All employees are responsible for understanding and adhering to this policy.

Review of this Policy

This policy is subject to annual review by the Head of HSQE & the Managing Director to ensure that the management system is effective, consistently implemented and continually improved. It is made available in all site folders, information boards and on OneNote.

All employees are encouraged to actively participate in the development and implementation of company policies and processes through feedback loops and dedicated forums.

James McHugh
Managing Director
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