

B. & M. McHugh Limited

MODERN DAY SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT



Statement of Policy

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

B. & M. McHugh Ltd are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business.

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.

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;
- 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;
- Expecting and encouraging staff to report concerns to management and the protection of whistleblowers;
- Continually audit and review company procedures in the recruitment, right to work checks and pay of all staff.

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.

Responsibility for this Policy

Managing Director is the Director responsible for the implementation of the policy, together with each Director and Manager within their own realm of responsibility.

Review of this Policy

This policy is subject to annual review to ensure that the management system is effective, consistently implemented and continually improved. 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
March 2024