



Modern Slavery and Human Trafficking (MSHT) Policy Statement

This statement sets out the Michael Lonsdale Group (MLG) – (Inclusive of Michael Lonsdale Ltd, Michael J Lonsdale Ltd, Michael J Lonsdale Electrical Ltd, E7 Building Services Ltd) 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 March 2020 to 28 February 2021.

As part of the Building and Engineering Services Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing modern slavery and human trafficking (MSHT) in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure:

- Michael Lonsdale Group is a Mechanical and Electrical Contractor working within the Construction and Building Services Sectors supplying full Mechanical, inclusive of Public Health and Electrical Building Services Packages.
- The organisation currently operates two sites within the United Kingdom and has an annual turnover in excess of £200m.
- Staff Profile –

“MLG have no gender bias and employ 240 both full and part time personnel”

Supply chains Adherence to our Values:

- Our Supply Chain is wide ranging and include a range of organisations, eg Pipe installers, Duct-workers, Plumbers, Electricians, Commissioning Engineers, Insulation installers, BMS and many more. We engage with them to provide and assist the Group with labour and materials throughout the full installation and commissioning process. This formulates some 90% of the labour turnover per project.
- We accept that there may be a risk to MSHT as we rely upon the practices of our supply chain to support our Business. However, we have a Zero tolerance to modern slavery and human trafficking and we expect all those in our supply chain and contractors to comply with our values.

Whilst the responsibility for formulating this policy rests with the Board/Directors it should be kept administratively up to date by Arthur C Lander MJL Group HSE Director. The responsibility for enacting this Policy and ensuring compliance rests with the Board/Directors. They and the Senior Management are responsible for ensuring due diligence is carried out in relation to any issues



raised around MSHT. It is the responsibility of all employees to understand the principles and apply its concepts in practice.

Policies:

- Michael Lonsdale Group has a number of In-House Policies which describe and lay out the minimum requirements for all our Staff, Supply Chain and any third parties. MLG is committed to conducting its business in accordance with applicable laws and to the highest ethical standards.

Relevant Policies:

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Employee code of conduct: The organisation's code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour and also when managing its supply chain.

Supplier/Procurement code of conduct: The organisation is committed to ensuring that its 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. The organisation will work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. (MJL-QHSE-Q 003, Q5.2, 5.2.1, 5.2.2 refers)

Recruitment/Agency workers policy: The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. It is also a condition of working for the MLG that all Sub Contractors and Supply chain Partners that salaries are paid at or above the minimum wage (MJL-QHSE-Q003, Q5.2, 5.2.1, 5.2.2 refers)

Corporate Social Responsibility Policy Statement:

The Michael Lonsdale Group recognises that our business activities have direct and indirect impacts on the communities and environment in which we operate. As a responsible employer we are committed to the principles of fair trade, respect for human rights and environmental protection.

Equality and Diversity Policy:

The organisation is committed to valuing diversity, providing equal opportunity in employment, ensuring that the work environment is free of harassment and ensuring that all employees are treated with dignity and respect. Where any employee or contractor/third party supplier disregard these values, action may include disciplinary action or termination of contract.



Whistleblowing Policy:

The organisation has a whistleblowing policy in place to enable employees to raise any legitimate concerns about specified matters and these might include MSHT matters.

Due Diligence:

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- conducting supplier audits or assessments through Michael Lonsdale Group's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans.
- 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

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- Reviewing its existing supply chains on a regular basis. This may be annually, at the contract renewal date and/or at the point of instruction of an installation or commission.
- Ensuring that all personnel engaged by MLG or through recruitment agencies are vetted to ensure they have the right to work in the UK.
- A further indicator will be to ensure that all staff are familiar with the MSHT statement. They will also receive training as required for their role within their probation period or within 6 months of the training programme being implemented.

Training:

For all our staff: To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business.

All Directors have been briefed on the subject and are aware of their responsibilities and need for due diligence of any issue raised.

We will make training available to staff, focusing particularly on those that are dealing with supply chains and commissioning projects and installations.

Using our normal communication channels all staff will be aware of this statement and their responsibilities.



This statement is made pursuant to section 54(1) of the Modern Slavery and Human Trafficking Act 2015 and constitutes our groups slavery and human trafficking statement for the current financial year.

Director's signature: *G A Herbert*

Name: G A Herbert

Position: Managing Director

Date: 21/02/2020