



**MICHAEL LONSDALE**  
GROUP

## 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 29<sup>th</sup> February 2022 to 28<sup>th</sup> February 2023.

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.

It will publish its Slavery and human trafficking statements on the government-run platform, to illustrate transparency, commitment and accountability in this area.

### 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.
- As part of the engagement and procurement process, all supply chains will be asked to consider this policy and confirm that they have measures in place to monitor and prevent modern slavery and human trafficking in its activities.



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Whilst the responsibility for formulating this policy rests with the Board/Directors it should be kept administratively up to date by Arthur C Lander MLG 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 and will be available for all to access.

## 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. (MLG-IMS-017, 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 (Mlg-ims-017, 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.



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## 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.
- We will assess our supply chain further to determine their KPIs as well our share our assessments
- We will review and assess the site/job to identify potential risks
- We will invite the relevant suppliers to attend our online workshops on awareness of human trafficking. The appropriate 'tier risk level' will be invited to attend the relevant workshop.
- Reporting system: engaging with all stakeholders (both internal and external) that have a good understanding of the specific worksite

We will assess the impact of the above and revisit periodically. In addition, our company aims to



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report on any gaps in findings and make this document available company wide. All such future statements will be reflective of any change, as should this take place, we will take precaution to re-issue our policies.

## **Risk Assessment**

We risk assess aspects of our business to ensure any potential harm or risk is identified and deal with as detailed here:

Recruitment – We pre-approve our supply chain/recruiters to ensure this value aligns. We provide copies of our anti-slavery policy, human trafficking policy. We also provide requirements for vigorous right to work checks adhering to Home Office standards. We only accept original copies of such documents, which are then kept on file.

Jobs- our roles are spot checked to identify any risks and 'hot spots'. Risk is tier measured from low to high risk and includes the implication associated with each. We aim to assess:

- 'hot spots' of risk
- Vulnerable populations as identified by ONS (UK)
- High risk geographics
- High risk service categories
- Increase visibility of site manager responsibilities
- Clear indicators of risks (behaviour and actions of others, unmarked appliances and vehicles, unauthorised personnel on site)

## **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



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Training on awareness for management is completed as part of our Supply Chain Sustainability commitments. These include:

- Introduction to Modern Slavery
- Evaluating the Risks of Modern Slavery & Labour Exploitation in Supply Chain
- Tackling Modern Slavery in Supply Chains
- Modern Slavery Act 2015 Training and Awareness
- The Modern Slavery Act for Businesses Open Discussion
- Modern Slavery Helpline Information and Guidance

Director's signature: 

Name: G A Herbert

Position: Managing Director

Date: 14/02/2022