



Meldrum Construction Services Group Ltd¹

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

¹ Group companies include Meldrum Building Services Ltd, Meldrum Facilities Ltd, Meldrum Construction Services Limited, Meldrum Structural and Civil Engineering Ltd and Meldrum Plant and Transport Ltd.



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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 30 November 2019.



1. Introduction

Meldrum Construction Services Group Ltd is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

2. Our organisational structure and operations

Meldrum Construction Services Group Ltd & its subsidiary companies, employs approx.160 people and operates primarily in the North East of England and Scotland.

Meldrum Construction Services Group Ltd is an expanding and innovative UK construction company with its base in the North East of England.

We design, construct and maintain developments that strengthen local communities and enhance the nation's infrastructure. Whether we're building new family homes, schools and offices or upgrading highways and hospitals, efficiency and effectiveness is at the heart of everything we do.

Our people and their know-how are what make us stand out from the crowd. Our talented, hard-working team of 160-plus time-served tradespeople and professionals means we have all of the capabilities in-house to handle projects of any size and complexity.

The rapid growth of the business since its establishment in 2001 is testament to the quality of this work and our relentless customer focus.

We have a total annual turnover of between £25m - £30m.

3. Nature of our supply chains

Our key supply chains involve specialist construction subcontractors, merchants and independent traders.

4. Policies relating to slavery and human trafficking

This modern slavery policy in conjunction with our anti-bribery policy, reflects our commitment implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices listed below infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

Modern Slavery is a broad term used to cover the offences of slavery and involves the following practices which include but are not limited to:

- Debt Labour /Bondage
- Exploitation of Children
- Forced labour
- Human Trafficking
- Human Slavery
- Servitude
- Sexual Exploitation

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

5. Risk assessment

We assess all of our sub-contractors and suppliers using the same approval criteria. Any sub-contractor that is largely labour focused (as opposed to materials) is scrutinised in more detail.



We also seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking.

6. Due diligence processes in relation to slavery and human trafficking

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains we undertake the following due diligence processes in relation to all new suppliers identified as being high risk according to the risk assessment procedures described above.

Every sub-contractor and supplier is formally approved for use via our evaluation process, 'sub-contractor approval process (08-08)' is part of our robust Quality, Environment, Management, Safety (QEMS) System which is ISO 9001:2015 accredited. Only approved suppliers and sub-contractors are used on our projects. Following approval, all insurances, accreditations, financial information and performance is monitored on a rolling basis. Sub-contractors that do not provide adequate records in a timely manner are removed from the approval list.

Ongoing evaluation of both sub-contractors and suppliers takes place during the life of the projects and any suspicious behaviour / conduct with external parties is escalated to senior management for review, this would include suspicion of trafficking – see training reference below.

7. Staff training

We make specific provision in our whistleblowing policy for the protection of those who whistle-blow in relation to an issue of modern slavery and/or human trafficking.

8. Monitoring of our anti-slavery policy

We intend to use the subcontractor approval process to monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

9. Policy review

The policy will be reviewed on an annual basis along with the monitoring processes to ensure safeguarding and that the policy and process is fit for purpose.

	Dave Meldrum CEO March 2022	Review Date: March 2023
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