

# Meldrum Group - Modern Slavery Statement <sup>(1)</sup>

Updated March 2023

## Modern Slavery Statement for the financial year ending 31<sup>st</sup> December 2022

This statement is made pursuant to section 54(1) The Modern Slavery Act 2015 and sets out the steps that Meldrum Group has continued to take to address the risk of slavery or human trafficking within its operations and supply chain.

### Our Business

Meldrum Group is a leading construction company based in the North East of England.

The key areas of our operation that could be affected by slavery and human trafficking are our directly hired employees, agency workers working on our behalf, subcontractor operatives working on our sites, and the workforce of our supply chain who supply materials to our business. The steps that we take to mitigate risks in relation to each of these areas are as follows:

### Our Policies

Meldrum remains committed to ensuring there is no modern slavery or human trafficking in its supply chain or in any part of its business with a zero tolerance to non-compliance. Meldrum operates under a number of policies, which ensure the business is conducted to the highest ethical standard including:

1. Modern Slavery & Human Trafficking Policy (20-63) - we are committed to preventing slavery and human trafficking occurring in any of our corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.
2. Recruitment & Selection Policy (20-58) - we verify that all workers have the right to work in the UK prior to employment. All employees are aware of their working hours, leave and absence entitlements and other benefits via the Employee Handbook and Contracts of Employment. As part of the onboarding process for joining Meldrum Group, each employee receives essential policies and procedures for raising concerns.
3. Whistleblowing Policy (20-52) - we operate a whistleblowing policy applicable to all workers and stakeholders (internal and external) that actively encourages the reporting of unethical behaviour or

practices within our business or supply chain without fear of reprisals.

4. Anti-bribery Policy (20-56) - It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

### Our Supply Chain

Meldrum operates a robust approval process and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. Suppliers are required to confirm that their business operations comply with the Modern Slavery Act. Meldrum Group may terminate the contract at any time should any instances of modern slavery come to light.

### Company Adherence

In 2022:

- No incidents on Modern Slavery were reported.
- Potential suppliers completed a Meldrum Supplier Questionnaire and confirmed that their business operations complied with the Modern Slavery Act.
- Right to Work in the UK checks were completed for all workers prior to employment commencing.
- HR team checked bank accounts to ensure that they were in the actual person's name and not someone else, as a potential indicator of modern slavery.
- A Modern Slavery and Human Trafficking e-learning module is in the process of being developed and made available to all relevant Meldrum staff during 2023.

Signed for, and on behalf of, the Group Board:



**Dave Meldrum**  
Group CEO

Review: February 2024

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