



Mercon Ltd modern slavery policy

As an organisation we are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains.

As a limited company in the UK we work with a range of suppliers in the UK and we recognise the role we must play in promoting ethical business practices.

Policies

As part of our commitment to prevent modern slavery, we have implemented our Anti-Slavery Policy which influences all of our operational procedures within our organisation. We also make sure our suppliers are aware of our policies.

Our Anti-Slavery Policy is reflective of our promise to work ethically and with integrity within all our business relationships.

Due diligence

As part of our efforts to monitor and mitigate the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistle-blowers.

Risk and compliance

We regularly evaluate the nature and extent of our exposure to the risk of modern slavery occurring in our supply chains through the implementation of audits.

We do not consider that we operate in high-risk sectors or locations. However, we recognise that there is always the potential for slavery and human trafficking to occur so we will regularly evaluate our supply chains using risk assessments.

Mercon Ltd not tolerate slavery and human trafficking within our supply chains and if we identify such practices Mercon Ltd are committed to taking appropriate action.

Further actions and sign-off

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Mercon Ltd slavery and human trafficking statement for the 2022/23 financial year.

Date of Issue: 29/10/2022

Signed:



Date of Next Review: 29/10/2023

Print Name: Petru Mereacre

Position: Director

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Mercon Ltd modern slavery policy

Modern slavery is an international crime and a violation of fundamental human rights. It is a global problem that transcends age, gender and ethnicities. It may take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It permeates many aspects of the legitimate economy and the construction industry is one of the many industries in the UK targeted by traffickers and illegal/unlicensed gang masters.

The Modern Slavery Act 2015 was introduced in the UK in October 2015 with the aim of stamping out slavery and trafficking and created a number of new criminal offences. It also increased penalties and strengthened the powers of the police and border forces. The Act also contains several measures intended to encourage businesses to take steps to address modern slavery. Commercial organisations supplying goods or services with a turnover above £36 million must now comply with disclosure requirements.

The purpose of this policy is providing information and guidance to all persons working for Mercon Ltd in any capacity on how the company deals with modern slavery and the role that all individuals involved with our business must play in ensuring compliance with the Act.

Our Policy Statement

Mercon Ltd takes a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and expect our supply chain to impose the same standards on their own supply chain. We will therefore require this policy to be included in our supply chain contracts and appointments, and to be complied with.



Policy Application

This policy applies to all persons working for the Mercon Ltd on our behalf in any capacity and within any part of our business units, including employees at all levels, directors, officers, agency workers, seconded workers, and our supply chain including all sub-contractors, consultants, service providers, any other agents, and business partners.

Compliance with the policy

All our employees must read, understand, and comply in all respects with this policy. Any activity which could lead to or suggest a breach of this policy is strictly prohibited. It is the responsibility for all those that either work for Mercon Ltd or are under our control to ensure the prevention, detection, and reporting of any possible breaches of this policy.

All our employees are encouraged to raise any concerns about any issue or suspicion of modern slavery at the earliest possible stage. Mercon Ltd encourages openness and transparency and any person that raises a genuine concern in good faith under this policy will be supported by the business, even if they turn out to be mistaken. We will investigate all genuine concerns which are raised in connection with this policy and our employees are encouraged to act without any fear of reprisal.

Mercon Ltd will do everything it can to protect the confidentiality if this has been requested by an employee. However, employees are discouraged from making any disclosures anonymously, as this can limit the investigation process.

Following an internal investigation, Mercon Ltd may decide to alert the police.

Safeguards

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion they might have. If an employee considers that they have suffered any such treatment, then they should inform Mercon Ltd immediately.

Communication and awareness of this policy

Mercon Ltd recognises its statutory obligations in connection with the Modern Slavery Act and is taking appropriate steps to ensure that modern slavery does not take place within our business and our supply chains. However, we recognise that we do not control the conduct of individuals and organisations in our supply chains. We will take the following measures to ensure compliance, so far as we are reasonable able, to prevent modern slavery from occurring:

- We will provide training on this policy to all our employees
- We will communicate Mercon's Ltd zero-tolerance approach to modern slavery and this Policy to all sub-contractors, consultants, any other agents, business partners at the outset of our business relationship with them and as appropriate thereafter.
- We will review this Policy annually and update it where necessary.

Breaches of this policy

Any employee found to be in breach of this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any claims or allegations which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

We may terminate our relationship with other individuals and organisations working on our behalf if they are found to be breach this policy.

Responsibility for the Policy

Mercon Ltd has overall responsibility for ensuring that this policy complies with the Groups' legal and ethical obligations, and that all those under our control comply with it. Management at all levels within our business are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

For further information regarding Modern Slavery in the Construction Industry, please see the briefing fact sheet published by the UK Government which can be accessed Group intranet.

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Print Name: Petru Mereacre

Position: Director

Modern Slavery Policy

1. Introduction

Mercon Ltd takes the issue of modern slavery, as defined in the Modern Slavery Act 2015, seriously. We consider that the likelihood of an incidence of modern slavery in our business is extremely low.

2. Our business

Mercon Ltd as a bricklaying company undertakes buildings, construction throughout the UK. We operate in a number of sectors, primarily, housing, education, care, retail and commercial. Mercon Ltd is opposed to any form of forced labour including human trafficking and modern slavery and we recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking and are committed to preventing it in our activities and that of our supply chains.

3. Our policy in relation to slavery

We are committed to conducting our activities fairly, honestly and with the highest standards of integrity, in accordance with applicable law. We do not tolerate slavery in any part of our business and are committed to ensuring that it does not take place in our supply chains.

4. Risk assessment and due diligence

As a construction business operating in the UK, the key areas of our business that could be affected by modern slavery are directly hired employees, labour provided by our subcontractors, contingent supplied agency workers on our sites and the workforce of our supply chain who supply materials to our business.

The steps we have taken to mitigate risks in relation to each of these are as **follows**:

Directly Hired Employees

We verify that all directly employed employees have the right to work in the UK before they start work with us and we make all employees aware of their working hours, working time regulations, holiday and leave entitlements and all other entitlements via the employee handbook.

Subcontractors

When placing subcontractor orders for use on our sites, our formal subcontract reminds our subcontractors of Mercon Ltd.

Suppliers

We are committed to ensuring that there is no modern slavery in our supply chain or in any part of our business. We procure the majority of our sourced goods, services, products and materials from UK based organisations. Where possible we will procure from suppliers that are required to comply with UK laws on modern slavery. We want all our suppliers to consider the risks of modern slavery in their supply chain.

The above due diligence processes are aimed to:

- Identify risk areas in our business and supply chain.
- Reduce the risk of slavery from occurring.
- Monitor potential risk areas in our business and supply chain.

Policies

All relevant policies have been reviewed and updated to describe our approach to modern slavery.

Ongoing Review

Mercon Ltd recognises that compliance to the Modern Slavery Act 2015 will be an evolving process. Therefore, the contents of this statement will be reviewed and updated on an ongoing basis.

Responsibility

The board of Mercon Ltd is responsible for implementing this statement and its objectives to ensure that modern slavery is not taking place within Mercon Ltd, its subsidiary companies or its supply chain.



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