



# Modern Slavery & Human Trafficking

This statement relates to actions and activities of M Group Services and operating businesses as set out at the start of this statement, during the financial year **1 April 2023 to 31 March 2024**.

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## Board approval

This statement has been approved by the organisation's Operational Board who will review and update it at least annually.



**Andrew Findlay**, Chief Executive

**Dated:**

Operating businesses across the Group covered by this policy include:

Morrison Water Services, PMP Utilities, Agility Eco, ID Systems, I&C Process Solutions Ltd, Morrison Energy Services, Seeka, Morrison Data Services, Callisto, Protect My Property, Morrison Telecom Services, Magdalene, Avonline Networks, Waldon Telecom, Dyer & Butler, KH Engineering Services, Antagrade Electrical, Milestone Infrastructure, Z-Tech Control Systems Ltd, MGS Group Support and M Group Services Plant & Fleet Solutions.

## 01 Introduction

This statement sets out M Group Services' actions to understand all potential modern slavery risks related to the Group and its operating businesses. Ensuring there is no slavery or human trafficking within the Group and the supply chains under our control.

M Group Services recognises its responsibility to take a robust approach to slavery and human trafficking. The Group and supply chains are committed to prevent slavery and human trafficking in all its forms.

## 02 Organisational structure & supply chains

The Group is privately owned and delivers a range of essential infrastructure services within the Water, Telecom, Transport and Energy sectors in the UK and Ireland. The Group's supply chain is primarily based in the UK and provides aggregates, gas and water pipes and components, electricity and telecom cables, substation components and telecom equipment.

In addition, the company makes extensive use of subcontractors, plant and equipment providers, responsible for service delivery. Several clients supply materials to us directly on a free issue basis, for which they are responsible for sourcing via their own supply chain partners.

## 03 Countries of operation & supply

The organisation currently operates in the following countries:

**United Kingdom and Ireland.**

## 04 Risk activity assessment

The following is the process by which the Group assesses whether activities or countries are high risk in relation to slavery or human trafficking:

We are operating exclusively in the UK and Ireland with most of our supply chain partners also based in the UK. We consider the overall risk of slavery and/or human trafficking to be very low. This low risk is reflected by the absence of any incidences of modern slavery reported in the supply chain for the relevant financial period.

For all direct employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with UK government legal guidelines in respect of the National Minimum and National Living Wage.

For all indirect workers, we carry out a Health & Safety and Contract Familiarisation Induction prior to their commencement of work at which we can check their identity, qualifications, and competence.

We co-operate with our clients through regular client-led audits of our obligations under this policy and undertake to support the client in their shared duties to control modern slavery through our effective supply chain management.



## 05 Risk activity process

M Group Services runs a vigorous supply chain evaluation process across the Group, which includes compliance checks and risk assessments, to ensure our service partners meet or exceed our modern slavery and human trafficking policy requirements. During 2023/2024, 714 partner organisations have completed the process and gained M Group Services' approval.

Where we have identified a material risk, we have conducted supply chain assessment audits to ensure compliance with the agreed policies. We will continue to monitor our supply chain partners and conduct assessment audits where we identify there is a potential risk of slavery or human trafficking.

## 06 Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

**Policies:** HR Director and Procurement Director

**Risk Assessments:** Procurement Director and HR Director supported by Head of Group Assurance, will assess the risk of slavery or human trafficking within the supply chain, as part of the company's overall Risk Management and Governance process.

**Investigations/due diligence:** The Internal Audit Manager is responsible for carrying out investigations supported by the HR Department and operating divisions' Commercial teams.

The Procurement Department and operating businesses' Commercial teams are responsible for ensuring the companies' policies are communicated to the supply chain partners and form part of the supplier assessment process.

**Training:** Senior leaders are required to complete mandatory learning/refreshers training in modern slavery and human trafficking. During the financial year 2023/24, 2,392 employees completed the training.

## 07 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:

### Whistleblowing policy

The Group encourages all its workers, clients, and other business partners to report any concerns related to direct activities.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, clients, or others who have concerns can use our confidential helpline provided by Navex Global. There have been no incidences of modern slavery reported in the supply chain for the relevant financial period.

### Ethical business code of conduct

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

### Supply chain/Procurement code of conduct

The Group is committed to ensuring that its supply chain partners adhere to the highest standards of ethics. Partners 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 works with the supply chain to ensure that they meet the standards of the code.

Violations of the organisation's code of conduct will lead to the termination of the business relationship.

M Group Services' ethical business code of conduct forms part of the contractual documentation issued and is made available to all supply chain partners during engagement. We also provide links to an "Extranet" site where suppliers and subcontractors can access controlled documentation including the Ethical Business Code of Conduct.

As part of our supply chain evaluation, candidates are asked if they have a policy/statement that sets out the steps their organisation has taken during the financial year. This is to ensure that slavery and human trafficking are not taking place in any of their supply chains or in any part of their own business.

If any potential supply chain partner is unable to demonstrate their policies, we ensure that they agree to act in accordance with our policy.

### Recruitment Policy

The organisation recognises that any business providing contingent labour and recruitment services presents unique risks and as such has engaged a managed service provider to help oversee the supply of temporary labour. The managed service provider undertakes regular audits of supplying employment agencies to verify their operational processes and personnel, ensuring they are capable of recognising, preventing, and reporting modern slavery.

Regular compliance checks are undertaken to verify workers are being paid in line with minimum wage legislation, that there are no unlawful deductions, and no fees are being charged for work finding services.



## 08 Due Diligence

The organisation undertakes due diligence when considering taking on supply chain partners, and regularly reviews its existing partners. The organisation's due diligence and reviews include:

Evaluating the modern slavery and human trafficking risks of each new partner.

Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where material risks are identified.

Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action appropriately.

Invoking sanctions against suppliers that fail to improve their performance or which seriously violate our supplier code of conduct, in line with an action plan. Including the termination of the business relationship.

