

### What is Modern Slavery?

Modern slavery is a gross violation of human rights and encompasses offences which deprive people of their liberty in order to exploit them for personal or commercial gain. Such offences take several forms; ranging from slavery, servitude, forced and compulsory labour through to human trafficking and debt bondage.

The Modern Slavery Act 2015 was introduced to consolidate these offences and requires businesses, with a minimum annual turnover of £36 million, to demonstrate transparency in their supply chains in order to work towards abolishing modern slavery practices at all levels.

MLM recognises its responsibility to adhere to the Modern Slavery Act 2015 and is absolutely committed to taking steps in order to prevent slavery and human trafficking activities. MLM takes a zero tolerance approach to modern slavery and as such, intends to ensure that its supply chains are free from unlawful and immoral practices through transparent, ethical and compliant policies, procedures and corporate activities.

### MLM Group Structure

Established in 1966, the MLM Group (MLM) is a leading multidisciplinary design, compliance and specialist practice operating across the UK and internationally. We improve the built environment through creative technical design and engineering excellence, making a positive impact on projects from inception through to completion. At MLM, we have over 400 employees operating out of 13 UK offices and offices in Dublin and São Paulo.

### Raising Awareness

MLM has registered with the Stronger2gether campaign which provides guidance, resources and a network for employers, labour providers and their representatives to work together to reduce exploitation. MLM has incorporated elements of this guidance and resources into our current processes in order to raise awareness of the main issues; such as our due diligence measures and employee training as described below.

### Due Diligence Measures

MLM has formed a Modern Slavery Act Policy which it requires all employees, individuals and organisations working in any capacity for, with or on behalf of, to adhere to. The policy has been approved by the Board of Directors and made readily available to those who fall within its scope.

### Approved Supplier Process

As a demonstration of MLM's commitment to its responsibilities under the Modern Slavery Act 2015, MLM has recently incorporated the Modern Slavery Act Policy into its approved supplier process. MLM requires all suppliers to indicate that they understand and agree with the MLM Modern Slavery Act Policy in order to remain on, or be added to, MLM's approved supplier list. Failure to do so may result in termination of the relationship in order to enforce MLM's zero-tolerance approach to modern slavery.

### Measures

In the first instance we have begun by issuing our Modern Slavery Act Policy and a questionnaire to our current list of approved suppliers and we are carefully considering the responses we receive against our expectations. As we learn more, we will be able to review and improve the process of establishing and reducing any related risks in our supply chain.

## Training

MLM invests heavily in the training and development of its employees and has a comprehensive induction process for those joining the company. A new starter induction is held on a monthly basis at head office and this presents the perfect opportunity to raise awareness of modern slavery with new employees. MLM has therefore included training on how to identify and report suspicious behaviour should an employee come across potential cases of modern slavery during the course of their work.

Information and resources are also available to existing employees at all levels via MLM's internal communication tools.

## Other Relevant Policies and Procedures

MLM outlines in our Quality Policy Statement that as a group of companies supplying engineering and construction consultancy services, we must ensure that our operations are carried out to the highest standards practised in the industry. This is the first statement we have issued specifically in relation to our approach towards identifying and eradicating modern slavery from our supply chains. However, MLM has had a long-standing approach towards the prevention of slavery and human trafficking in its operations which is evidenced through the following policies:

### Corporate Social Responsibility (CSR)

CSR is integral to our business and plays a key part of the decision making processes in relation to engaging both professionally and ethically with our employees, clients, suppliers, general public, and local communities. There is a need for our business and people to make a positive contribution to the economy, society and the environment in which we operate, beyond our daily business. MLM's sense of CSR covers the environment and sustainability, equal opportunities, Health & Safety, community support, our people, working together and wellbeing. We have an internal wellbeing team which champions CSR within MLM and always welcomes input from others, as we are all responsible for CSR.

### Employee Conduct

We make clear to employees the actions and behaviour expected of them when representing MLM. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

### Equal Opportunities

MLM is an equal opportunities employer. We are committed to equality of opportunity in all aspects of employment and have policies and procedures to ensure equality of treatment for all employees. We aim to ensure that no one receives unjustified, less favourable treatment from MLM on the grounds of their sex, marital status, disability, age, religion/belief, race, colour, nationality, ethnic or national origins or sexual orientation. MLM processes a national minimum wage check on a monthly basis and an equal pay report every six months, to ensure a fair and compliant approach for all employees.

### Malpractice Policy

We encourage all of our employees, customers and other business partners to report any concerns related to MLM's direct activities and/or supply chains. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can refer their concern to the HR department or Chief Executive. We have mirrored these reporting lines in our Modern Slavery Act Policy too.

## New Employees

All offers of employment with MLM are subject to the employee providing evidence of their right to work in the UK, in the form of an original document. This original documentation is solely requested so that a certified copy can be produced to be held on the employee's personnel file and then the original documentation is handed back to the employee. All data held in relation to employees is recorded in compliance with the Data Protection Act 2018.

As a minimum, MLM complies with governing employment legislation and as such would never prohibit employees or workers of their statutory rights. The wellbeing of our employees is of paramount importance to MLM; demonstrable through the recent creation of our Wellbeing Steering Group, regular employee engagement surveys and accolade of being a One Star Best Company.

## Recruitment/Agency Workers

MLM only works with reputable recruitment agencies to source labour. Terms of business have to be reviewed and agreed between the recruitment agency and the HR department before accepting workers from that agency. MLM would never charge fees to employees or workers joining the workforce and wouldn't expect the recruitment agencies we work with to do so either.

Moving forward, we will continue to assess and evaluate the risks of modern slavery practices and human trafficking in our supply chains and take appropriate action where necessary. The measures and training we have in place will remain under review.

This statement covers the period from 1 May 2018 and has been approved by the MLM Board of Directors.



Neil Cooper  
Chief Executive  
MLM Group

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