



Modern Slavery Statement

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Introduction

Modern slavery is a universal issue affecting businesses in every industry across the world. At MV Kelly, we are fully aware of the significant risks and challenges posed by modern slavery. We are committed to acting with honesty and integrity in all our operations, and there is no place for modern slavery within our business or supply chain.

Organisation Structure and Supply Chain

MV Kelly is a specialist infrastructure, groundworks and civil engineering company covering most of the UK. Our supply chain comprises material suppliers, plant hire, and subcontractors consisting of labour only and supply and fix. We also engage with professional services providers such as accountants, insurers, and consultants. All our operations and activities are UK based. We do not have any seasonal workers. We have a centralised procurement team based at our head office.

Policies

Anti-Slavery Policy

MV Kelly has a legal and moral duty to protect workers within the businesses supply chain or under direct control from exploitation. The Company has a zero-tolerance approach to slavery and Human Trafficking. Our anti-slavery policy sets out our stance on modern slavery and its expectations of anyone working for or on behalf of MV Kelly Limited in any capacity.

Living Wage

MV Kelly is proud to be an accredited real living wage employer. All direct employees including apprentices are paid at least the real living wage as defined by the Living Wage foundation and our standard contract terms requiring our subcontractors to pay their own employees and subcontractors the real living wage. This ensures all our employees and workers on our sites received fair compensation that reflects the true cost of living

Other Policies and Processes

Our Modern Slavery Statement is supported by the additional policies and processes in the following areas:

- Employee Conduct
- Health, Safety and Wellbeing
- Leave and Time Off
- Pay and Benefits
- Recruitment and Selection

Due Diligence and Risk Assessment

As part of our continual risk assessment documented in our internal risk register we have identified that our primary risks for modern slavery is our supply chain.

To mitigate these risks we carry out due diligence on suppliers and subcontractors at the point of engagement and throughout the relationship, this entails both operational audits on MV Kelly sites and required assurances from our direct suppliers around compliance and transparency in relation to modern slavery.

We will not work with suppliers and subcontractors who are unwilling to confirm compliance with the Modern Slavery Act.

In addition to the above, we aim to reduce the risk of modern slavery by:

- Communicating our Modern Slavery Policy to all staff, suppliers and subcontractors when entering into new or renewed contracts with them
- Updating employees, clients and subcontractors on the evolving risk of modern slavery through our newsletter
- Regular training to employees and workers.

Measuring Effectiveness

MV Kelly Ltd remains low risk and we have not identified any modern slavery or human trafficking in the financial year 2023 – 2024 within the company, or within our supply chain. We actively monitor and work with suppliers and sub-contractors on compliance. Our current processes are considered effective however we will continue to educate staff about what modern slavery may look like in the UK as the risk, and our understanding, continues to grow.

Training

All new employees are trained in our policy and processes as part of their induction. Employees involved in monitoring the supply chain receive further training within their department. Updates to policy and training are issued to all employees as they occur.

Sign Off

This statement has been prepared in accordance with the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st May 2024. It was approved by the Board of Directors on 11th September 2024 and signed by the Chief Executive Officer on behalf of the Board on the same day.

(For & on behalf of the Board of Directors)

Name & Position: Kelly Linnett, Chief Executive Officer

Date: 11/09/24