

Modern Slavery and Human Trafficking Policy

Introduction

mclcreate are committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains. This policy supports our commitment to ensuring there is transparency in our approach to tackling modern slavery, and is made pursuant to s.54 of the Modern Slavery Act 2015.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms which include Slavery, Servitude, Forced or Compulsory Labour, and Human Trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Company Policy

Our Company has in place a number of policies which support the prevention and mitigate the risk of modern slavery and/or human trafficking existing in the business, and to ensure an open and transparent culture. These include the following policies:

- Whistleblowing Policy
To ensure there is appropriate protection in place for employees with regards to raising any concerns about how colleagues are being treated, or practices within the business
- Health and Safety Policy
To ensure our employees have a safe place to work
- Grievance Procedure
To ensure we have in place an open and transparent grievance process for all employees

In addition to the above, we shall ensure that:

- Right to Work documents are checked for all employees
- All employees have a written contract of employment
- We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to
- We are compliant with all government legislation regarding the National Minimum Wage and Equal Pay Act

Employee Responsibility

The prevention, detection and reporting of modern slavery and/or human trafficking in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are therefore asked to:

- Avoid any activity that might lead to, or suggest, a breach of this policy
- Notify your Line Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or is likely to occur in the foreseeable future
- Raise any concerns about issues or suspicion of modern slavery and/or human trafficking in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your Line Manager
- Notify your Line Manager as soon as possible if you believe or suspect a breach of this policy has occurred, or that it may occur.

Raising Concerns

Openness is at the heart of our business, and we aim to always encourage transparency and therefore support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We shall ensure that no one suffers any detrimental effects or treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place within our business or any of our supply chains.

Any employee who breaches this policy, including failing to notify an appropriate person about criminal actions of which you are aware, may lead to disciplinary action potentially resulting in dismissal for misconduct or gross misconduct due to a breach of contract.

We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.