



## MODERN SLAVERY POLICY

Modern slavery, servitude and forced or compulsory labour are unacceptable in a modern, twenty first century society. The trafficking of people (both adults and children) around the world both thrives on the demand created by such practices, and serves to create opportunity for unscrupulous employers. MTX Contracts Ltd (The Company) is committed to combating acts of modern-day slavery from within both the business and its supply chain. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the Company and with suppliers of goods and services to the Company.

### Company Structure

MTX Contracts Ltd is a privately owned construction company based in Cheshire, England. The Company directly employs around 40 people and offers the design and principal contractor services. MTX instructs subcontractors for specific packages of work and also uses suppliers to obtain materials, equipment, services and staff. Together, these make up the supply chain for MTX Contracts Ltd.

### Supply Chains

The supply of our 3<sup>rd</sup> party services is managed by our Pre-Construction and Project Teams. We have a wide range of suppliers and sub-contractors that cover the whole of the UK. Before becoming part of the MTX supply chain, suppliers and sub-contractors must first complete a rigorous internal appraisal form to ensure they have the correct policies, procedures and insurances in place before they can work with us.

### Due Diligence

MTX Contracts Ltd. reviews its subcontractor, materials, services and labour supply chain members regularly to ensure they comply with our policies and contractual requirements. All of the Company's supply chain members are vetted before they are admitted to its Approved Supplier List, which includes compliance with all MTX Contracts Ltd's policies. The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

### Relevant Policies

In keeping with the Company's commitment to act with integrity in all its business dealings, the Company's relevant policies are also relevant in ensuring that there is no slavery or human trafficking in any part of its business. Our policies set out how we are committed to acting ethically in our business operations including treatment of our employees, as well as our expectations for members of our supply chain to also implement and adhere to their own policies.

- P14 Equal Opportunities and Diversity Policy, including recruitment and anti-bullying – MTX oppose all forms of unlawful and unfair discrimination or victimisation. All employees, whether part time, full time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability and objective job-related criteria.

Form No:	P33	Issue	b	Approved by: DH	Date: 24/07/2021
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Our staff will not discriminate, directly or indirectly, or harass customers or clients because of race (colour, nationality, ethnic or national origins), gender reassignment, age, disability, sex, sexual orientation, marriage or civil partnership, pregnancy and maternity, religion or belief or associated reason in the provision of the Company's goods and services.

On the occasions we use agency staff, we only source these from reputable recruitment agencies that work nationally under the REC to source agency workers. All workers are checked for their 'right to work in the UK' status.

- Whistleblowing Policy – MTX encourage all employees, clients and supply chain partners to report any concerns they may have in regards to our activities, including any situations which could lead to an increased risk of possible human trafficking or slavery.

### **Risk Assessment and Management**

MTX engage with a third-party quality consultant to ensure we maintain the high standards of our ISO accreditations. We also appoint this consultant, along with our dedicated external HR consultant, to cover all topics of modern slavery and human trafficking to ensure a thorough understanding of the high-risk areas at Board level, fed down to all employees.

### **Key Performance Indicators (KPIs)**

MTX measure all areas of the business against industry standard KPIs for quality, environmental and health & safety. This includes the management of our modern slavery and human trafficking awareness within all of our operations. We are constantly evaluating and updating our human rights strategy to ensure best practice and improved controls business wide. This includes the establishment of relevant KPIs so we can continually monitor our progress.

### **Training**

MTX provide suitable and necessary training and information to all employees, covering the following key areas:

- Staff Inductions for all new starters
- Leadership and Management training for all Managers
- Employment and Management training for the HR Team

Our standard training for all employees also includes a focus on code of conduct. Additional training is also encouraged and available for employees who wish to develop further, as appropriate in their role.

### **Declaration**


This statement is made pursuant to section 54(1) of the Modern-Day Slavery Act 2015.

We will review this statement for suitability at least annually and communicate it to all staff. We will also review it following any changes in legislation.

Form No:	P33	Issue	b	Approved by: DH	Date: 24/07/2021
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The Company Directors and take responsibility for implementing this policy statement and associated objectives and will provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the Company's supply chain.

Signed: .....  ..... David Hartley IEng MCIBSE FIHEEM  
*Managing Director*

AUTHORISED BY THE MANAGING DIRECTOR

Form No:	P33	Issue	b	Approved by: DH	Date: 24/07/2021
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