

## MCSA Group Ltd

### ANTI- SLAVERY AND HUMAN TRAFFICKING STATEMENT FY16/17

#### INTRODUCTION FROM THE GROUP CHAIRMAN

As a business we have a responsibility to be alert to the risks of modern slavery and human trafficking, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

We expect all who have or wish to have a business relationship with MCSA Group and/or any member of our Group, to familiarise themselves with our anti-slavery values and to act at all times in a way which is consistent with our anti-slavery values.

#### MCSA GROUP LTD ANTI- SLAVERY VALUES

As part of our culture of good governance for good business, we operate to a set of core values, which stem from our family run ethos to reflect in our relationships with our customers, suppliers and team members. Our business values and relationships reflect our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can within our own business dealings. We expect and demand the same attitude of all those who work for us and expect it of all with whom we work with.

#### ORGANISATION'S STRUCTURE & SUPPLY CHAIN

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The relationship with all our suppliers has been established over a number of years and is built upon mutually beneficial factors, where we have close and personal links and contact with the owners or directors of these suppliers. The same applies to all major vendors that we deal with.

To date we haven't been made aware of any human trafficking / slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. As part of our initiative to identify and mitigate risk:

- Where possible we build long standing relationships with suppliers and business associates and make clear our expectations of business behaviour with regards to Modern Slavery and Human Trafficking;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes and to conduct appropriate risk assessments with their own contacts within their own supply chains.
- We have put in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## SUPPLIER ADHERENCE TO OUR VALUES

As a group we have a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We fully expect our employees and business associates to act in this way and to assist in the implementing and enforcement of effective systems and controls to ensure modern slavery is not taking place in our own businesses or those of our suppliers.

## AWARENESS AND TRAINING PROGRAM

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff, particularly in our procurement teams. All Directors and Senior Managers have been briefed on the subject and the Company's policy on Modern Slavery and Human Trafficking has been made available both on the Company's website and internal intranet.

Additionally, sections within our Employee handbook have been added to cover where to find these policies, and procedures for reporting any suspected incidents.

## ADDITIONAL 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 organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. 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, customers or others who have concerns can contact our HR Department at Head Office who will advise complainant of the relevant Company Director/Investigating Officer in line with the Whistleblowing policy.

- **Employee Handbook & Code of Conduct-** The organisation's Employee Handbook and Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year. Following the initial adoption, the Modern Slavery and Human Trafficking Statement and Policy will be reviewed annually by the Company's Board of Directors and may be amended from time to time.



Roger Timms  
Group Chairman