

Anti-Slavery & Human Trafficking Policy Statement



Introduction

The UK Modern Slavery Act of 2015 (the Act) requires commercial organisations with a consolidated global turnover greater than £36m to provide disclosure concerning their efforts to address the issues of slavery and human trafficking in their supply chains for each financial year. The disclosures are intended to set out what an organisation has done to prevent modern slavery in their own business and supply chain.

Structure and Supply Chain

McAvoy is a Smart Offsite Construction Company offering services to a range of clients in the UK and Ireland.

Our Supply Chain includes companies who supply raw materials, transport, shipping of materials & products, specialist trade contractors that undertake supply and fix contracts, labour-only subcontractors and specialist professional organisations that provide a range of services across the portfolio of projects and services that we deliver for our clients.

McAvoy recognises that slavery and human trafficking can occur in many forms.

McAvoy is committed to meeting its obligations under the Act. We have developed and will continue to develop and improve our systems and processes to avoid complicity in human rights violations related to our own operations and those within our supply chain.

We believe that working in partnership with our clients, stakeholders and supply chain in a sustainable way enables us to find practical and safer methods of ethical trading free from slavery and human trafficking.

Policies and Procedures

We operate the following internal policies to ensure that we are conducting our business in an ethical and visible manner:

- Anti-Bribery and Corruption Policy
- Dignity at Work Policy
- Diversity and Inclusion Policy
- Equal Opportunities Policy
- Ethical Sourcing Policy
- Recruitment & Selection Policy
- Supplier Code of Conduct

Due Diligence

McAvoy operates a preferred supplier database and conducts due diligence on all suppliers before permitting them to become a preferred supplier.

Our Anti-slavery Policy and compliance with the Modern Slavery Act, form part of our contract with all suppliers and sub-contractors, and they are required to confirm Right to Work provisions, and that no part of their business operations contracts our policy or breaches the Act.

Anti-Slavery & Human Trafficking Policy Statement



We will only trade with those who fully comply with this policy and terminate the contract at any time should any instances of slavery and human trafficking become apparent.

Suppliers and sub-contractors are required to notify McAvoy as soon as they become aware of any instance of modern slavery and/or human trafficking taking place in their business or their own supply chain, through their own due diligence or internal whistleblowing processes.

Risk Assessment

McAvoy carry out regular risk assessments across its operations including its supply chain. If there are reasonable grounds to suspect slavery or human trafficking, this will be escalated to a Senior Manager and Head of HR to investigate further.

McAvoy will treat all concerns raised seriously, investigating and escalating as appropriate and taking and required action without undue delay.

Measuring Effectiveness

Our in-house audit team conduct operations-independent regular audits of our sub-contractors on site to identify if common markers of Modern Slavery exist, and to safeguard against it taking place within the business or our supply chain. We require our suppliers and sub-contractors to take steps to prevent slavery and human trafficking in their own supply chain.

During financial year ended 31 May 2024 there were no non-conformances raised in relation to slavery or human trafficking.

Training for Staff

McAvoy regularly provides information; toolbox talks and awareness training so that staff understand the signs of modern slavery and human trafficking and know the action to take if they suspect that it could be occurring.

Employees and third parties are encouraged to raise concerns about modern slavery via our whistleblowing process.

Sign Off

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes McAvoy Anti-Slavery and Human Trafficking Statement for the financial year ending 31st May 2024. It has been approved by our Board of Directors, who will review and update it as necessary on an annual basis.

Approval Level: **Board of Directors April 2025**

Ron Clarke
Chief Executive Officer