Anti-Slavery Policy

April 2026

MVKELLY
CIVIL ENGINEERING

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Policy Overview

M.V. Kelly Limited recognises its legals and moral responsibility to protect workers within its operations and supply chains. The Company operates a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically, with integrity and transparency, in all business dealings.

We are committed to complying with the Modern Slavery Act 2025 and to taking effective steps to prevent modern slavery and human trafficking within our business and supply chains.

This policy sets out the Company's stance on modern slavery and human trafficking and outlines the responsibilities and expectations placed on employees, contractors, suppliers and other business partners.

This policy applies to all persons working for or on behalf of M.V. Kelly Limited in any capacity.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Definition

Modern Slavery
Modern Slavery is the recruitment, movement, harbouring or receiving or children, women, or men through force, coercion, abuse of power or vulnerability, deception or other means for the purpose of exploitation.

Under the Modern Slavery Act 2015, offences include but not limited to:

- Slavery.
- Servitude.
- Forced or compulsory labour.
- Human trafficking, including facilitating travel with the intention of exploitation.

Signs of Modern Slavery and Human Trafficking

Identifying potential victims of modern slavery can be challenging. All employees and associated persons are expected to remain vigilant and to conduct appropriate due diligence within their areas of responsibility and supply chains.

Possible indicators of modern slavery may include individuals who:

- Appear to be under the control of another person and reluctant to interact with others.
- Do not possess personal identification documents.
- Have few personal belongings or wear inappropriate or repetitive clothing.
- Are unable to move freely or appear isolated.
- Avoid eye contact or interaction and appear frightened or withdrawn.
- Shown signs of physical or psychological abuse.
- Are consistently dropped off and collected for work in the same manner, particularly at unusual times.

These signs do not necessarily confirm modern slavery, but they should raise concern and prompt further action.

Compliance and Expected Conduct

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or overseas, is the responsibility of everyone working for or with M.V. Kelly Limited. You must:

- Avoid any activity that could contribute to or result in modern slavery.
- Act in a lawful, ethical and responsible manner.
- Report concerns promptly in accordance with this policy.

The Company also expects its suppliers, contractors and business partners to uphold the same standards and to implement appropriate controls within their own operations and supply chains.

Reporting Concerns

If you believe or suspect that modern slavery or human trafficking may be taking place within the Company's business or supply chains, you must raise this as soon as possible.

We are committed to handling all concerns promptly, fairly, and consistently.

Concerns may be reported through several channels:

- Whistleblowing Officer: Richard Lennon
  - Email: whistleblowing@mvkelly.co.uk
  - Post: FAO: Whistleblowing Officer. M.V. Kelly Limited, Cogen Court, 151 Cranmore Boulevard, Shirley, Solihull B90 4LN
- Website: https://mvkelly.co.uk/whistleblowing-form/
- HR Department: mvkhr@mvkelly.co.uk
- A member of M.V Kelly Limited Senior Leadership team

Concerns may also be reported to external organisations, including:

- Modern Slavery Helpline on 08000 121 700 or online at www.modernslaveryhelpline.org/report
- Crimestoppers on 0800 555 111 or online at https://crimestoppers-uk.org/give-information/forms/give-information-anonymously

The Company will treat reports confidentially where possible and will support anyone who raises a genuine concern in good faith, even if it later proves to be unfounded. M.V. Kelly Limited will not tolerate retaliation against anyone who reports concerns appropriately.

Training and Communication

The Company will provide appropriate training to employees to ensure they understand:

- The risks of modern slavery.
- How to identify potential indicators.
- How to report concerns.

Training will be provided as necessary and refreshed periodically.

The Company's zero-tolerance approach to modern slavery and human trafficking is communicated to suppliers, contractors and business partners at the start of, and when renewing, commercial relationships.

Breach of This Policy

Any breach of this policy by an employee will be taken seriously and may result in disciplinary action, which may include dismissal for gross misconduct where appropriate.

Where an employee is suspected of involvement in, or of failing to report, modern slavery or human trafficking, we will carry out an investigation in line with Company's disciplinary procedures. Where breaches are substantiated, appropriate disciplinary action will be taken.

Where a supplier, contractor, subcontractor or other associated person is found to have breached this policy or to have been involved in modern slavery or human trafficking, the Company reserves the right to suspend or terminate its commercial relationship with immediate effect.

Where appropriate, the Company will report concerns or findings to the police or other relevant authorities, which may result in criminal investigation and prosecution under the Modern Slavery Act 2015.

Responsibilities

Employees

- Act ethically, responsibly and with integrity at all times.
- Comply with this policy and all applicable laws relating to modern slavery and human trafficking.
- Remain vigilant to the risk of modern slavery within the Company's operations and supply chains.
- Report any actual or suspected cases of modern slavery or human trafficking promptly in accordance with this policy.
- Co-operate fully with any investigations relating to modern slavery or human trafficking.

Line Managers and Directors

- Lead by example and promote a culture of zero tolerance towards modern slavery and human trafficking.
- Ensure employees within their areas of responsibility understand, comply with and adhere to this policy.
- Identify and manage modern slavery risks within their teams, projects and areas of control.
- Ensure appropriate due diligence is carried out in higher-risk activities, including labour sourcing and supply chain engagement.
- Take prompt and appropriate action where concerns are raised, including escalating matters for investigation where necessary.

HR

- Support the implementation and ongoing effectiveness of this policy.
- Provide advice and guidance on modern slavery matters to employees and managers.
- Support and oversee investigations into alleged breaches of this policy in line with Company procedures.
- Ensure appropriate disciplinary action is taken where breaches by employees are substantiated.
- Work with the L&D team and management to promote awareness and compliance.

Learning & Development

- Develop and maintain appropriate training and awareness materials relating to modern slavery and human trafficking.
- Ensure relevant training is delivered at induction and refreshed periodically.
- Support role-specific or enhanced training for employees in higher-risk roles.
- Maintain appropriate training records to evidence compliance.

Sub-contractors, Self-Employed Persons and Other Associated Persons

- Comply with all applicable modern slavery and human trafficking legislation.
- Act in a manner consistent with the principles and standards set out in this policy.
- Take reasonable steps to prevent modern slavery within their own operations and supply chains.
- Promptly report any actual or suspected modern slavery connected with the Company's business.