

INTRODUCTION FROM THE MANAGING DIRECTOR

We are proud of the steps we have taken to combat slavery and human trafficking, which includes the implementation of a formal policy and an annual review of procedures to ensure compliance across our business.

ORGANISATION'S STRUCTURE

We are a provider of Civil Engineering, Building and Development in the Construction sector. McPhillips (Wellington) Limited has its head office in Telford. We have approximately 290 employees and operate solely in the United Kingdom.

We have a global annual turnover of circa £50m.

OUR BUSINESS

Our activities are undertaken solely in the UK and our key clients are National Housebuilders, Local Authorities, Housing Associations and National Animal Welfare Charities. We also work with established private business owners with premises based in the UK.

OUR SUPPLY CHAINS

Our supply chains Procurement activity takes place only in the UK, and our sub- contractors and suppliers are predominantly UK based.

We have a strict procurement policy in place as part of our ISO 9001 Quality Assurance programme, which is subject to annual audit from Exova BM Trada. The procurement policy implements a select list of suppliers, for which a strict pre- qualification process has to be passed prior to any orders being placed. Qualification is subject to ongoing performance reviews.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

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.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

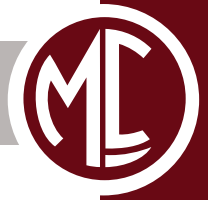
SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

TRAINING

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 our staff.



**OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Since July 2015 we have taken the following steps with regard to implementing the Modern Slavery Act:

- We have Established a Modern Slavery Policy
- We have identified those staff likely to be impacted by the Act
- We have arranged training on the Modern Slaver Act via our independent HR Advisors
- We have raised awareness by circulating details of the Act and its requirements to the wider management and procurement teams

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30th September 2019.

Paul Inions
Managing Director
McPhillips (Wellington) Limited

Date: 30th September 2019

