



This Statement Is Made Pursuant to Section 54 Of the Modern Slavery Act 2015 And Constitutes Malcolm Charles Conservation Limited's Company's Slavery and Human Trafficking Statement

Introduction

This statement relates to actions and activities during the year 1 April 2024 to 31 March 2025.

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This includes but is not limited to child labour, forced labour, and debt or bonded labour. We are committed to acting ethically and with integrity in all our business dealings and relationships.

Everyone has a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. All employees are expected to be aware of and to follow the guidance outlined in the company's Anti-Slavery and Human Trafficking Policy including child labour, forced labour, or debt or bonded labour, and to report concerns. Managers and site agents of the company are required to act whenever any concerns or doubts are raised whether from within or from outside of the business.

Organisation's Structure

Malcolm Charles Conservation Limited is a construction company based in the UK. The company has its head office in Keston, Kent. We employ 7 staff at our head office and up to 20 site-based staff working on contracts.

Principal Areas of Business

The Company is a construction company specialising in conservation of historic buildings. Our supply chain comprises the engagement of subcontractor organisations to carry out works and services on our construction sites and the sourcing of materials and manufactured products. Our customers are Trusts and Entities looking after historic and special buildings. We are committed to ensuring that slavery and human trafficking including child labour, forced labour, and debt or bonded labour plays no part in our supply chain or any part of our business.

Countries of Operation and Supply

The Company sources supply from across the UK and with customers in the UK. Our supply chain consists of companies in the following main categories: Timber, Waste management and Plant Hire. We maintain preferred supplier lists for each category.



High-Risk Activities

The following is the process by which the company assesses whether or not particular activities are high risk in relation to slavery or human trafficking including child labour, forced labour, and debt or bonded labour:

The Company carries out a risk assessment by requiring its new subcontractors to complete a subcontractor evaluation confirming compliance to modern slavery principles and existing subcontractors to reconfirm this annually. Only companies that are deemed low risk will meet our approved supplier list.

The following activities are considered to be at high risk of slavery or human trafficking including child labour, forced labour, and debt or bonded labour:

No high-risk activities at present.

Responsibility for the Company's anti-slavery initiatives is as follows:

Policies: MCC. has various policies in place that address the possible risks in our supply chain regarding issues of modern slavery. These policies have been drafted and ratified by the Managing Director. The policies are reviewed annually.

Risk assessments: The Managing Director is responsible for human rights and modern slavery risk analysis including child labour, forced labour, and debt or bonded labour.

Investigations/due diligence: The Managing Director would lead any investigations relating to reports of known or suspected instances of modern slavery and trafficking including child labour, forced labour, and debt or bonded labour.

Relevant Policies

We are fully committed to ensuring that modern slavery or human trafficking plays no part in our supply chain or in any area of our business. All our staff undertake to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as reasonably practical, ensure slavery and human trafficking is not taking place anywhere within the company or its supply chain.



The Company 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 including child labour, forced labour, and debt or bonded labour in its operations:

Whistleblowing. The Company encourages all its staff, customers and suppliers to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking or child labour, forced labour, and debt or bonded labour. Whistleblowing is dealt with in accordance with the procedure set out in its Whistleblowing Policy and is designed to make it easy for staff to make disclosures, without fear of retaliation. Customers or suppliers who have concerns can contact our Managing Director in complete confidence.

Employee code of conduct. The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating on client sites and managing the supply chain.

Supplier code of conduct. The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. We have zero tolerance to slavery and human trafficking including child labour, forced labour, and debt or bonded labour and we expect all those in our supply chain and contractors to comply with our values. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

Recruitment Policy. The Company will only engage with specified, reputable employment agencies to source staff (when necessary) and always verifies the practices of any new agency it is using before accepting workers from that agency. The company has its own robust recruitment practices when recruiting directly and ensures that it complies with all UK and relevant European legislation in respect of employment law.

Due Diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.



The Company's due diligence and reviews include:

Evaluating the modern slavery and human trafficking risks including labour practices, and any other relevant factors of each new supplier via the completion of a subcontractor compliance statement and obtaining their relevant policies and procedure relating to this;

Reviewing our purchasing and selling processes;

Where possible we build long standing relationships with our suppliers and subcontractors and make clear our expectations of business and ethical behaviour.

Invoking sanctions against customers and suppliers that violate our code of conduct, including the termination of the business relationship.

Performance Indicators

The Company is developing its key performance indicators in support of the Modern Slavery Act 2015. As a result, the Company will be:

Raising awareness of modern slavery and trafficking including child labour, forced labour, and debt or bonded labour, as part of its induction process to relevant staff;

Reviewing its existing supply chains, whereby the company evaluates all existing suppliers following the completion of compliance statements;

Where a risk assessment has highlighted an issue in a supply chain, it will measure the progress against reducing the risk.

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 all members of staff.

This Statement is reviewed on an annual basis.

Signed *Thomas Scopes*

Position Director

Dated 24.1.24