
Mercury Construction (South West) Ltd

Anti-Slavery and Human Trafficking Policy

1. Aims of this Policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our organisation. It sets out our commitment to addressing the risks of modern slavery with our suppliers and other organisations who we have business relationships with.

The policy applies to all individuals working for or on our behalf including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

We expect all parties who have a business relationship with us to familiarise themselves with this policy. They are expected to always act in a way that is consistent with our values.

We will only do business with organisations who fully comply with this policy or those who are taking steps towards compliance.

2. What do we Mean by Modern Slavery?

Modern slavery can take many forms and covers four key criminal activities as follows:

Slavery: where ownership is exercised over an individual.

Servitude: involves the obligation to provide service imposed by coercion.

Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

All forms of modern slavery result in the loss of an individual's freedom by another to exploit them for commercial or personal gain. This amounts to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our operations and business relationships.

3. How we Seek to Embed our Anti-Slavery Policy in Practice

To underpin our policy commitments, we have implemented the following measures:

- Where appropriate, as informed by our risk assessments, we will undertake pre-screening of prospective suppliers (as part of our tender processes) on the effectiveness of their existing safeguarding controls and practices preventing modern slavery occurring within their organisation and their own first tier supply chain.

- Our contractual documentation includes prohibits slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour. We make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

4. Responsibility for this Policy

The Directors have overall responsibility for this policy. They will ensure we comply with all our legal and ethical obligations.

All managers have the primary day-to-day responsibility for the implementation of this policy. They will monitor its use and ensure the appropriate processes and control systems are in place and updated as required.

All managers are responsible for ensuring that those reporting to them comply with this policy in the day-to-day performance of their roles.

5. Communication and Employee Awareness Training

The Directors will ensure that all relevant employees receive adequate training on this policy and any supporting processes applicable to their role.

6. Breaches of this Policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

Breaches of this policy may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to summary dismissal in line with our disciplinary procedure.

You are expected to fully co-operate with any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear you must seek clarification from a Director.

7. Reporting Procedure

Reporting Procedure

Any employee, contractor, or third party who suspects or identifies a case of modern slavery within the organisation or supply chain should immediately report it.

The following steps should be followed:

- **Step 1:** Report to your immediate supervisor or manager. If you feel uncomfortable doing so, please report the concern to the HR department or a Director.
- **Step 2:** All reports will be treated seriously, confidentially, and investigated promptly. The individual reporting the issue will be kept informed of the investigation's progress where appropriate.

External Organisations for Reporting

If an individual believes that their concern has not been addressed within the

company, or if they prefer to report the issue externally, they can contact one of the following organisations:

- **UK Modern Slavery Helpline**

Website: <https://www.modernslaveryhelpline.org>

Phone: 08000 121 700

Email: help@modernslaveryhelpline.org

The UK Modern Slavery Helpline is available 24/7 and can provide advice and assistance on modern slavery issues.

- **Gangmasters and Labour Abuse Authority (GLAA)**

Website: <https://www.gla.gov.uk>

Phone: 0800 432 0804

The GLAA tackles labour exploitation and human trafficking in the UK and works with law enforcement agencies to investigate and prevent these crimes.

- **National Crime Agency (NCA)**

Website: <https://www.nationalcrimeagency.gov.uk>

Phone: 0370 496 7622

The NCA is responsible for tackling serious and organised crime, including human trafficking and modern slavery.

8. Status of this Policy

This Anti-slavery Policy will be reviewed by the Company's directors on a regular basis.

This policy does not give contractual rights you and we reserve the right to alter any terms at any time. We will notify you in writing of any changes which may affect you.

Signed:  _____

Print Name: _____ D Welch _____

Job Title: _____ Director _____

Date: _____ 1st February 2026 _____

Review Date:- _____ 1st February 2027 _____

