

MODERN SLAVERY ACT COMPLIANCE STATEMENT – Jan 2020

Introduction

The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all of its business dealings and relationships.

The Company is committed to implementing and enforcing effective systems and controls, to ensure that modern slavery and human trafficking are not taking place anywhere within either, its own business or in any of its supply chains. The Company endeavours to be consistent with its obligations under the Modern Slavery Act 2015. This statement constitutes the Marlborough Highways compliance statement for the financial year ending 31 December 2019.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Scope

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways.

Some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

Our supply chain consists of around 1000 suppliers. Most of our supply chain are UK based however directly and indirectly we purchase some materials and services from Europe and Asia.

Marlborough Highways currently operates only in the United Kingdom. The following are the processes by which Marlborough Highways assesses whether activities or countries are high risk in relation to modern slavery or human trafficking.

Since 2016 our leadership teams from across the business has been working together to train, educate and support our colleagues and our supply chain in raising awareness and tackling modern slavery.

We have developed Anti-slavery policy and all suppliers are required to undergo our supplier evaluation process which involves them to answer questions in relation to their compliance with the Anti-Slavery Act. Through the supplier portal we have communicated to all our suppliers that Marlborough Highways has a zero-tolerance approach to use of modern slavery and human trafficking in our operations and supply chain and that Marlborough Highways expects that our suppliers will hold their own suppliers to the same high standards.

Responsibilities

It is the responsibility of all Marlborough Highways personnel, particularly those focussed on our procurement and in operational site teams, to maintain Marlborough Highways's duties in respect of the Modern Slavery Act 2015.

Directors and senior managers hold special responsibilities to hear and support those raising concerns in compliance with the Act and our related Whistleblowing policy in respect of our integrity policies and the bribery act.

What actions been taken till date

	Internal	Supply Chain
Risks	<p>We understand our internal risks are:</p> <p>Recruitment Temporary staff and labour</p> <p>These risks are regularly reviewed.</p>	<p>We understand our highest supply chain risks are:</p> <p>Labour Logistics Contracting Purchases outside the UK Suppliers with long, complicated supply chains</p>
Documentation	<p>Anti- Modern Slavery and Human Trafficking Policy Has been developed and signed and approved by MD, Made available to all staff on the QUEST library, which defines what integrity means for our business and offers detailed guidance to help employees when they are confronted with challenging situations.</p> <p>Recruitment policy Whistleblowing</p> <p>These documents are regularly reviewed.</p>	<p>Supplier Code of Conduct Based on the United Nations Global Compact we expect all suppliers to adhere to the standards in our Contractual agreements Including reference to modern slavery policies.</p> <p>Supplier portal questionnaires</p> <p>These documents are regularly reviewed.</p>

<p>Due diligence</p>	<p>Preferred supplier list In place for all permanent and temporary recruitment to ensure that workers have the right to work in the UK and that worker's own rights such as holiday pay, sick pay and appropriate salary are fulfilled.</p> <p>Payment processes Checks in place on duplicate bank accounts to ensure no suspect activity.</p> <p>Open Door Policy We are committed to an open culture where employees feel secure in seeking advice or raising concerns and have confidence that reports are handled in a professional and transparent way.</p> <p>To help enable this culture, we have established a open door policy, where any member of staff can reach Marlborough Highways board Director and report their concerns about any potential breach of our Business Code of Conduct.</p>	<p>All suppliers are required to undergo our supplier evaluation process which involves them to answer questions in relation to their compliance with the Anti-Slavery Act.</p> <p>Through the supplier portal we have communicated to all our suppliers that Marlborough Highways has a zero-tolerance approach to use of modern slavery and human trafficking in our operations and supply chain and that Marlborough Highways expects that our suppliers will hold their own suppliers to the same high standards.</p>
<p>Education and awareness</p>	<p>E-learning training modules All members of staff and managers must undertake a modern slavery E learning module, which is part of our integrity suite. Scheduled to be complete by Dec 2020.</p> <p>Anti-Slavery policy displayed in QUEST library accessible to all staff and subcontractors.</p>	<p>Restart inductions We host regular forums that include focus on education and sharing of best practice for our Modern Slavery, Drug & Alcohol and responsible procurement policies.</p>

Targets and next steps

	Internal	Supply Chain
2020 targets	<p>Ensure we provide awareness training to those that have missed in the earlier roll out.</p> <p>Include awareness of Modern Slavery in site and business inductions, including newly formed and acquired contracts.</p> <p>Review training plans for supervisors and contracts managers to include modern slavery.</p> <p>Prevention of illegal working guidance will be created and rolled out to the business.</p>	<p>Improve our supplier portal questionnaires to further ensure compliance by suppliers and also to share our Anti-Slavery policy on the portal.</p>
Next steps	<p>Continue with awareness campaign, using e-learning and toolbox talks to further embed modern slavery within the Marlborough Highways group.</p>	<p>Continue auditing of high risk suppliers</p>

By implementing our policies and working together with our suppliers we aim to demonstrate that we operate our business ethically, responsibly and sustainably.

Statement signed and approved by

Matthew Revell
Managing Director
15/01/2020