

# Modern Slavery and Human Trafficking Statement

**This statement sets out the approach Mace Construct Holdings Limited and all its subsidiaries, , including Construct and Develop, (known as ‘MCHL’) has taken to date and those MCHL intends to take throughout the 2026 financial year with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.**

## Organisation and supply chain structure

All MCHL companies rely upon this statement, where necessary, for the purpose of complying with their individual annual reporting requirements of the Modern Slavery Act 2015. The approach and processes referred to within the statement are relevant to all MCHL companies and MCHL will continue to monitor performance in complying with the Act’s requirements as a basis for future annual statements.

MCHL is a UK centric construction company, providing pre-construction, buildability, construction services, within the built environment markets and sectors. MCHL currently operates in the UK and Ireland. Our supply chain is mainly based in the UK and Ireland and comprises contractors, service providers, producers of materials and manufacturers of a variety of products used in professional services and the construction process.

Integrity is one of the core values of MCHL. Mace is committed to being a responsible business and upholding high ethical standards as well as being a catalyst for positive change in all our operations, including those provided by our supply chains around the world.

As construction experts operating across a wide range of markets and sectors, our approach to proactively addressing the risks of modern slavery reflects local context and the services MCHL offers. Our principal area of business operations is as follows:

- **Construction:** including Public, Commercial, Infrastructure and Specialist Services – responsible for managing contractors and suppliers (materials and labour) in the supply chain and the on-site workforce.
- Managing, assuring and delivering client requirements across project and programme management, cost and commercial management, and planning.

Our direct responsibilities under the Act cover the work we deliver within our Construct business.

Our primary risk area is within the highly tiered supply chain structure relating to construction delivery.

The Group Chief Executive Officer, Jason Millett, is the Board member responsible for oversight of the MCHL approach to eradicating modern slavery from business operations. The Procurement team, Responsible Business team, Compliance team, Legal team, and Human Resources team each support implementation of the MCHL approach to tackling modern slavery. Each of these teams works across different business sectors, geographies and services.

Further details relating to our business operation can be found on our website [www.macegroup.com](http://www.macegroup.com) and in our latest published annual report.

Our organisational structure supports a diverse and extensive supply chain that includes subcontractors, consultants, and suppliers across a wide range of sectors. We maintain a centralised supply chain management system to ensure consistent standards, visibility, and oversight. All suppliers must be formally approved before engagement, and our preferred supply chain consists of strategic partners who are regularly assessed for capability, compliance, and performance.

MCHL has working relationships with unions and police forces around the UK in relation to preventing modern slavery and works alongside partners such as EcoVadis and SEDEX, as well as charities such as Hope for Justice (Slave free Alliance) to help implement our approach.

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## Contributing to society:

Employees	7,941
Hours of volunteering	29,000
Charitable donations	£700k
Value to society	£933m

Above figures are based on the latest published accounts of Mace Finance Limited 2024.

## MCHL policies in relation to slavery and human trafficking

MCHL has made several commitments and developed policies designed to help us eradicate modern slavery. These include:

- **Management systems ISO9001:2015, ISO14001:2015 and ISO45001:2018;** which include procedures and guidance documents outlined below.
- **Modern Slavery and Human Trafficking Policy Statement Ref MG-ENV-PL-009.** This policy statement sets out the approach MCHL, including its subsidiaries has taken to date and those MCHL intends to take throughout the 2026 financial year with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.
- **Modern Slavery and Human Trafficking Internal Policy** Ref MG-ENV-PL-002. This purpose of this policy is to highlight our approach to mitigating the risks that modern slavery and human trafficking pose to our business, clients, and supply chain.
- **Modern Slavery – Guidance on Supervision** MG-ENV-GD-077. This guidance explains what MCHL expects of its employees and of third parties operating on its behalf to ensure that Modern Slavery is eliminated from MCHL business operations and those of our suppliers.
- **Modern Slavery – Guidance on Procurement** MG-ENV-GD-076. This procurement guidance explains what MCHL expects of its employees and of third parties operating on its behalf to ensure that Modern Slavery is eliminated from Construct business operations and those of our suppliers.

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- **Master Subcontract Annex** – The minimum contract requirements tackling modern slavery MP-PC-FM-006. The annex includes contractual commitments to preventing modern slavery and human trafficking in our supply chain.
- **Social Value Policy Statement** Ref GP-RB-PS-0001 sets out our commitment to being a responsible business and is required to be read in conjunction with our Responsible Business 2026 Construction Delivery Procedures & Guidance, Modern Slavery & Human Trafficking policy statement and our Code of Ethics.
- **Responsible Business 2026 Construction Delivery Procedures & Guidance** Ref MG-ENV-PR-040. This document treats modern slavery as part of responsible sourcing and procurement. Key implications being that project teams must review and apply responsible procurement policies when: preparing bids, setting up packages and scopes, engaging suppliers and subcontractors. Modern slavery controls are therefore managed upstream, through procurement requirements, contractual expectations, supplier compliance with MCHL policies
- **MCHL Code of Ethics** Ref GP-LG-CD-0005. Our Code of Ethics outlines the standards of behaviour we all seek to uphold at MCHL, forming the core of our culture. While it may not cover every possible situation, it provides guiding principles to follow this includes modern slavery and human rights. The Code also offers advice on what to do if you have concerns or need guidance in any situation.
- **MCHL Speak Up** Ref GP-LG-PS-0002 which sets out the whistleblowing reporting service and supporting procedures. The purpose of the Speak Up policy is to encourage a culture of openness and integrity by providing a clear, confidential route for raising concerns about suspected wrongdoing, unsafe practices or breaches of our values and legal obligations. It explains what types of issues should be reported, how to report them (including anonymous options where permitted), how reports will be investigated, and the protections in place to prevent retaliation against anyone who raises a concern in good faith.
- **Mace Supplier Code of Conduct** Ref GP-COM-CD-0001 which all MCHL suppliers must comply with. The purpose of this code is to set clear expectations and minimum standards for behaviour and performance in relation to MCHL's values and ways of working. It explains what MCHL requires from suppliers (and their own supply chains) across key areas including modern slavery and human rights. Ultimately, it is intended to promote consistent, responsible decision-making and to protect MCHL, its clients, and partners by ensuring suppliers operate to the highest applicable standards. The Supplier Code of Conduct forms part of the Master Subcontract Annex.
- **MCHL Industrial Relations Standard** Ref CN-HSW-SD-0003 which sets out the fair employment practices expected by MCHL as a minimum standard in our supply chain in order to reduce the risk of Modern Slavery.

These policies clearly outline our expectations of suppliers and ensure alignment with legal and ethical standards.

## Identification of risks, together with steps taken to prevent and manage those risks, and due diligence processes in relation to slavery and human trafficking in business and supply chains.

The Global Slavery Index provides significant evidence that labour standards risks could be present in construction and property supply chains, in the production of construction materials, delivery of construction activities and through the provision of professional services equipment such as laptops and phones. To identify and mitigate the risks of slavery and human trafficking, MCHL makes informed decisions regarding the procurement and management of labour, goods, and services, utilising the following:

- Clear definition and contractual terms setting out our expectations of our suppliers (as listed in our policies listed above).
- Identification of issues and risks (using Supplier Ethical Data Exchange – SEDEX product and risk-profiling sector) to inform procurement decisions.
- Use of prequalification tools with the Common Assessment Standard to assess UK contractor and supplier compliance; and further due diligence of suppliers using SEDEX. These tools assess suppliers against labour standards, health and safety, environmental and business ethics criteria, identifying issues and risks.
- Training and supplier development.
- Compulsory annual training for all MCHL staff and construction supplier leadership teams on slave labour and human trafficking risks and how to spot the signs of potential issues.
- Collaboration with our clients, peers and suppliers on Modern Slavery issues
- MCHL Speak Up whistleblowing reporting service and supporting procedures.
- Introduction of PPAC on specific sites, checking for Right to Work and skills competency (e.g. CSCS cards) checks.

Where staff have concerns around issues of forced labour, human rights, recruitment practices or exploitation, they are encouraged and expected to report concerns to management via a confidential phone number or online reporting service. This is part of the MCHL Speak Up policy supported by Safecall. All reports will be investigated by a designated team coordinated by the Head of Group Compliance.

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## CASE STUDY 1

### Workforce Engagement Meetings MCHL Project Site:

MCHL recognises the importance of an open, transparent and psychologically safe environment for everyone working across our projects. We recognise the importance of having an established structured programme of monthly Workforce Engagement Meetings designed to ensure that construction workers can openly raise concerns, share observations and highlight good practice without fear of reprisal.

On one particularly large project, the meetings are chaired by MCHL's Industrial Relations Director and are attended by operatives from our supply chain partners. However, to protect individual's privacy and encourage frank discussion, only the names of participating organisations are recorded, not the

names of attendees. Workers are invited to raise any issues they have encountered on site, including matters relating to fatigue management, mental health awareness, employment rights, welfare standards and skills competence card requirements. The Industrial Relations Director takes direct ownership of investigating all matters raised and ensures that responses and actions are clearly communicated. Outcomes are fed back at subsequent monthly meetings and are displayed across the project welfare facilities through the 'You Said: We Did' boards, reinforcing transparency and accountability. This engagement model not only strengthens trust and collaboration across the workforce but also enables early identification of potential risks, including any indicators of modern slavery. By fostering a culture in which workers feel empowered to speak up, Mace enhances both worker welfare and vigilance against exploitation.

## Assessing and managing risk – 2025 key steps taken

We identify and assess modern slavery risks using a range of industry-recognised tools and data sources, for example:

- Six independent construction site assessments representing a sample of our UK construction sites were scheduled in 2025.
- Three assessments were undertaken by the Slave free Alliance, the fourth scheduled assessment was delayed until 2026. Two assessments were undertaken by clients' independent assessors.
- Engaged with site workforce on all construct projects, via site wide toolbox talks and workforce consultation meetings, including engagement about modern slavery awareness.
- Engaged with numerous supply contractors to establish their industrial relations arrangements, how they employ their staff and site workforce, discussed modern slavery mitigation – what is their policy and process- how is this communicated to the workforce, where required gave guidance and advice including promoting membership of SEDEX.
- Modern Slavery Awareness posters with helpline numbers are displayed on selected noticeboards and included in the site induction packs.
- Supply chain contracts executed to compel vendors to comply with all Laws relating to anti-slavery, human trafficking laws and illegal worker statutes, regulations and codes.
- Applied the Common Assessment Standard (CAS) as part of the pre-qualification checks which has a complete section that covers modern slavery and is independently marked by four assessment providers.
- Speak Up Policy was reviewed and updated.
- All MCHL people were required to certify their compliance with the MCHL Code of Ethics and underlying policies which include the Modern Slavery Policy.

Where any issues are identified, MCHL works with suppliers to seek resolution through training and development. If the issue is deemed serious and/or is not capable of remediation, MCHL will remove the supplier from our supply chain until the issue is fully resolved.

## Due diligence in relation to modern slavery

Our due diligence processes safeguard against modern slavery in our supply chain. In addition, MCHL's business strategy contains KPI's which link to the eradication of modern slavery, including for 2025:

1. Clear contractual requirements and expectations for suppliers.
2. Key materials (e.g. concrete, steel, plasterboard, timber) we sourced responsibly.
3. Direct suppliers must certify that all materials they provide are compliant with human trafficking and slavery laws.
4. Key tier 1 strategic partners sign up to SEDEX by the end of 2026.
5. Employment Businesses and/or Agencies were required to operate in compliance with the MCHL Industrial Relations Standard (CN-HSW-SD-0003 Industrial Relations Standard V3).
6. MCHL will conduct worker modern slavery surveys on projects over the course of 2026.
7. Access Control Systems utilised to automate checking of employees' rights to work.
8. Mandatory prequalification for all subcontractors and consultants, including CAS certification.
9. Ongoing monitoring of supplier financial stability and performance.
10. Use of our whistleblowing ("Speak Up") service, enabling staff and suppliers to report concerns confidentially.
11. Investigation of all reported incidents and take appropriate action.
12. 100% of MCHL staff will complete the modern slavery e-learning training.

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## CASE STUDY 2

### Modern Slavery Awareness JV Project Site:

On another large joint venture project site MCHL is working alongside its joint venture partner who is responsible for managing the site workforce and meeting the client's requirements on modern slavery prevention and workforce protection. In addition to displaying modern slavery awareness materials and promoting confidential reporting routes, the joint venture has strengthened its approach by embedding a dedicated modern slavery awareness module into the mandatory site induction. This ensures that every individual

entering the project, whether staff or site operatives, receives training that includes practical guidance on identifying the signs of modern slavery and understanding how to raise concerns. The session is interactive, with knowledge checking questions to reinforce learning and ensure comprehension. The induction also includes information about the joint venture's collaborative partnership with Unite the Union, highlighting how trade union membership can provide support, protect workers' rights and help prevent exploitation across the supply chain. Through this proactive and inclusive training approach, the joint venture ensures that modern slavery vigilance is not only a management responsibility but a shared commitment across the workforce.

## Training

MCHL's E-Learning module was launched in 2017 and, including regular updates, forms one of the compulsory modules to be undertaken during new starter probationary periods. This online training module is also rolled out to our existing workforce on an annual basis. At the end of 2025, 100% of all staff directly employed, and contractors, completed the course. This module is further reinforced through other training and initiatives that have been rolled out across MCHL and will continue to be implemented including:

- Inclusion of Modern Slavery Learning in Sustainable Construction training, which is mandatory for all Construct teams.
- Through the charity, Hope for Justice, who has provided awareness training and worker surgeries for construction sites.
- Provision of posters and helpline information on our construction sites.
- The inclusion of modern slavery content in the MCHL company induction for all new starters.
- Addition of modern slavery issues to our whistleblowing and escalation processes in our updated Speak Up policy.
- Investing in the supply chain through training and improvement programmes directly improves the service we provide for our clients. For companies at the top of the preferred supply chain, MCHL provides a programme of external courses that have been identified to address any shortcomings in the supply chain capabilities. Some of the initiatives that underpin this are workplace training and objective setting, agreement on standards jointly set by participating parties and arranging training days with sub-contractors covering topics such as procurement processes and procedures, health and safety, financial reporting and the pre-construction period. We also hold regular supplier briefings and conferences headed up by representatives of the senior leadership team to make our suppliers aware of our strategy and to discuss issues of common relevance. Further, we advise our suppliers on health and safety, CSR, and occupational health using our in-house practitioners. The supply chain is also encouraged to provide technical training workshops to staff through the external provider to ensure the transfer of knowledge relating to best practice in their specialists' processes.

## Monitoring and evaluation: understanding and demonstrating effectiveness

Further to the initiatives in the section above, in 2026, MCHL plans to continue its work to eradicate modern slavery and human trafficking from its business. Activities will cover monitoring and evaluation and include:

- Monitoring of supplier performance.
- Escalation of concerns to senior leadership through established reporting processes.
- Continual improvement actions informed through audit findings, supplier performance data, and stakeholder feedback.
- Further Events for our construction supply chain partners to raise awareness of modern slavery.
- Further industrial relation audits focusing on tackling modern slavery.
- Improve communication to site-based workforce via the project site induction, ensuring relevant modern slavery information and awareness is communicated. In addition, when assessing projects ensuring posters with modern slavery information is clearly displayed.
- To continue the Slave Free Alliance construct site assessments during the year.
- Update Ecovadis Assessment to improve our rating.
- Update our UK Government Modern Slavery Assessment (MSAT) to improve our rating and address any identified actions.
- Continued promotion of SEDEX and use of SEDEX pre-screen tool to inform decisions.
- Support Client led SMETA audits on modern slavery where risks are identified through the use of SEDEX prescreening and risk assessment.
- Further Hope for Justice worker engagement surgeries led by the Head of Group Compliance.
- Increased use of document checkers such as PPAC to combat forged documents and improve workers' access to documentation.
- Continue to engage the workforce, both within our own operations and throughout our supply chains to create open and transparent forums that will allow site workforces to raise issues around modern slavery and human trafficking.

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- Strategic Partners to be encouraged to pursue Ethical Employment certification as an add-on to Common Assessment Standard (CAS) prequalification.
- Additional surveys of our supply chain partners to clarify modern slavery practices used in their supply chains (Tiers 2/3/4).
- Further drive to encourage our supply chain to undertake Achilles Ethical Labour Audits or similar.
- We are improving our data collection channels by adding API data download from SEDEX, which will allow us to access modern slavery analytics about our supply chain.
- The API will automate the data transfer from SEDEX's database to your internal system, allowing us to improve our decision making while also closely monitor SEDEX statuses of our Tier 1 supply chain.

#### Benefits:

- Improved visibility – ability to see suppliers' information such as non-compliances, audit information and self-assessment questionnaire completion/status, in your own systems. Allowing us to analyse SEDEX data against our own data.
- Increased productivity – having automated data in one place saves us time and money.
- Analysed trends – we will have visibility of historical information on the last five years of our suppliers' audit information – allowing us to analyse and predict trends.

#### **About this statement:**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes MCHL slavery and human trafficking statement for the financial year ending 31 December 2025.

#### **Approved by the board and signed on their behalf by:**



**Jason Millett**  
Group Chief Executive  
April 2026