



People Policies – Modern Slavery Policy Statement

1. Introduction

This statement is in accordance with The Modern Slavery Act 2015 and applies to Munnelly Group LTD, company number **05475234** (referred to in this statement as ‘the Company’). The information included in the statement refers to the financial year 2026/27.

The Company is committed to conducting its business to the highest ethical standards and is dedicated to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain.

2. Responsibilities

Paul David Munnelly, Chief Operating Officer, has responsibility for the ethical trade and corporate social responsibilities of the business including responsibility for preventing modern slavery.

3. Organisational Structure

Munnelly Group LTD is a market leading construction and infrastructure support services group, with headquarters in London and regional offices in Shropshire and Somerset that are led by a board of directors. Munnelly Group LTD is the parent Company of eight businesses, each Company in our Group operates as a single entity but are all underpinned and centred around the key values and ethos of the Munnelly Group brand.

The key services offered by the Group includes (but not limited to):

- Pre-construction logistics planning
- Logistics Management
- Traffic Management
- Security
- Site Access Control
- Employment Services
- Payroll
- Construction site labour supply
- ICT Services
- Health & Safety Management
- Marketing and Positioning Management
- Bid, Tender and Proposal Management
- Surveying

4. Supply Chains

Through our various subsidiaries we provide support services to the construction and infrastructure sectors, including, but not limited to, fatigue risk management, site access control, security, plant operations, work rostering, logistics. pre-construction planning, delivery management, traffic management, waste management, operative supply, payroll and invoicing solution, software solutions and geospatial consultancy and surveying. The majority of our supply chain is UK based, and we engage over 1100 individuals throughout the UK.

5. Definitions

The Company considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity, or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

6. Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not engage into business with any other organization, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom

7. Risk & Compliance

To mitigate the risk within our workforce, we carry out pre-employment checks, including right to work checks on all new employees, and this is extended to all workers provided through our labour supply chain. Our preferred suppliers for the provision of workers are regularly audited and we have robust contracts in place. We therefore consider that the risk of modern slavery occurring within our workforce is minimal. We risk assess our supply chain based on the type of goods or services provided, the location and how critical the supply is to our business.

8. Due Diligence

The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our Company or supply chains, including conducting a review of the controls of suppliers.

The Company has not, to its knowledge, conducted any business with another Company which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Company has taken the following steps to ensure that modern slavery is not taking place:

- We have robust pre-employment procedures and workflows as part of our recruitment process.
- Ensuring that our supply chain meet minimum requirements in relation to modern slavery and ethical labour practices, and audits are carried out with the supply chain to ensure standards and compliance.

9. Policies

Our Modern Slavery Statement operate in conjunction with our policies on Anti-Bribery, Equal Opportunities, Ethics Policy, Whistleblowing, and our Right to Work Procedure.

10. Training/ Awareness

To raise awareness amongst our people about Modern Slavery we have a link to the GLAA Modern Slavery Video listed on the HR intranet in our 'HR Policies' folder, which is accessible to all our people. This video demonstrates to our people what to look out for and what appropriate action to take if they suspect a case of slavery/human trafficking.

The Company is also committed to ensure our people continuously understand our stance on Modern Slavery and this includes:

- Implementing training, such as online group training and face to face training where appropriate.
- Encouraging conversations around Modern Slavery and how one should look out for it.

- Using our Company engagement platform, 'Viva Engage', to communicate and continuously raise awareness to our people each year on the anniversary date of 'Anti-Slavery Day'.

11. Reporting

Should an individual have concerns regarding trafficking, they should make use of the Company's Whistleblowing Policy, or the external advice line contained therein. Information on the GLAA helpline and Modern Slavery Support Line will also be made available.

The reporting of such concerns is a serious matter and will be investigated formally and resolved. Where necessary the Company will consider using external agencies or Consultants to carry out investigations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed:



Paul David Munnelly, CEO