

SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT (FINANCIAL YEAR 2018/2019)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the current financial year, setting out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.

Introduction

Slavery and forced labour can take many forms, including human trafficking or child labour. This statement sets out McLaren Construction Ltd actions to understand all potential modern slavery risks. As part of the construction industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to maintaining and improving systems and processes to prevent human rights violations related to our own operations and that of our supply chain.

Organisational Structure

We are a construction company based in the UK and the United Arab Emirates. The company has its head office in Brentwood, Essex and regional offices in London, Birmingham and Dubai.

Our Policies on Slavery and Human Trafficking

The Company is committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in the Company or our Supply Chain. We comply with all legislation, importantly the Immigration Act 2015 - ensuring we prevent any illegal working.

Our Supply Chain

Our Supply Chain comprises the engagement of sub-consultant and subcontractor organisations to carry out works and services on our construction sites as well as the sourcing of materials and manufactured products. We play an active role in supplier development and have adopted various means to clearly communicate our expectations of our suppliers.

As part of our initiative to identify and mitigate risk:

- We strive to build long standing relationships with our suppliers, sub-consultants and subcontractors and make clear our expectations of business behaviour
- We have in place, systems to encourage the reporting of concerns and the protection of whistle blowers
- We encourage anyone (including employees, sub-consultants, sub-contractors and suppliers) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices

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UK Supply Chain Due Diligence processes

As part of our initiative to identify and mitigate risk:

- We expect our Supply Chain to have suitable anti-slavery and human trafficking policies and processes.
- We have adopted a strict and stringent Pre-Qualification System, by way of Achilles Building Confidence, which is an industry specific, audited process, which is deemed to be market leading for all of our key trade contractors.
- Within the past twelve months, we have further strengthened our PQQ Process to adopt Constructionline Membership as pre-requisite to qualify for our Approved List of Sub-Contractors - all Constructionline Members will require an SSIP (Safety Schemes in Procurement) in order to be considered.
- We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

United Arab Emirates Supply Chain Due Diligence processes

- McLaren Construction Ltd.'s UAE operations are acutely aware of the need for attention to the origin, sourcing and recruitment of the workforce and the need to ensure that appropriate due diligence measures and monitors are effected to limit exposure to exploitation (including slavery and human trafficking) of both the directly employed workforce and the supply chain.
- Our UAE Operations, in employing and mobilizing their own direct workforce, has recognized the need to avoid intolerable recruitment practices and in pursuit of this has deployed an approved, registered "sourcing" partner who is committed to dealing directly with the workforce and not through any sub-agents or partners, again limiting the possibility of exposure to exploitation. Coupled with this partner, they have, in strict compliance with relevant employment legislation and stringent overseas foreign ministries rules, engendered robust procedures in selection, appointment and reimbursement of the workforce, paying keen attention to key exploitation deterrents, such as ensuring that payments and benefits given to workers are commensurate with their employment contracts and paid directly to the employees themselves.
- With regards to our procurement of the supply chain, we are equally intolerant of slavery and human trafficking practices and therefore carefully select our business partners on the basis that they, similarly, strictly comply with applicable legislation, foreign ministries rules and obligations contained within order documentation concerning the same.

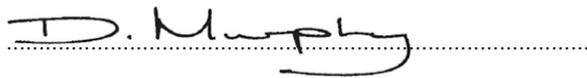
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Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training to relevant members of staff when applicable. All Directors have been briefed on the subject.

The Board of Directors of the Company delegate the approval of this statement on its behalf to the Managing Directors of the Company.

For and on behalf of McLaren Construction Ltd
on 01 July 2018

A handwritten signature in black ink, appearing to read "D. Murphy", is written over a horizontal dotted line.

David Murphy

Managing Director - Distribution and Mixed Use