



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 McLaren Group's slavery and human trafficking statement, setting out the steps the group 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 Group's 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 preventing 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 those of our supply chain.

Organisational Structure

The McLaren Group of companies operates in construction, property investment and development, in the UK and United Arab Emirates. It has permanent offices in Brentwood, London, Birmingham, Reading, Manchester 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 – to ensure we prevent any illegal working.

Our Supply Chain

Our supply chain comprises the engagement of sub-consultant and sub-contractor 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 suppliers.

As part of our work to identify and mitigate risk:

- We 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 to protect whistle blowers.
- We encourage anyone, including employees, sub-consultants, sub-contractors and suppliers, to report in good faith any issues or concerns about potential or possible ethics, human rights, legal or regulatory violations, including improper or unethical business practices.

UK Supply Chain Due Diligence Processes

- We expect our supply chain to have suitable anti-slavery and human trafficking policies and processes, in line with the Modern Slavery Act 2015.
- We have adopted a strict and stringent pre-qualification system, by way of Achilles Building Confidence and Constructionline, which are industry-specific, audited processes. This is deemed to be market leading for all of our key trade contractors. All Constructionline members must have an SSIP (Safety Schemes in Procurement) membership in order to be considered for approved status.
- Supply-chain members are reviewed annually, as part of their ongoing membership of Constructionline or Achilles Building Confidence. Any organisation in the supply chain that fails to maintain the required membership status will be removed from the McLaren approved supplier list.
- We expect each entity in the supply chain to carry out due diligence on the next link in the chain, taking ownership for this to ensure compliance. It is not practical for McLaren (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 applied to limit exposure to exploitation (including slavery and human trafficking) of both the directly employed workforce and the supply chain.
- Our UAE operation, in employing and mobilising its own direct workforce, has recognised the need to avoid intolerable recruitment practices and, in pursuit of this, has deployed an approved, registered sourcing partner that 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, it has, 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 procurement of the supply chain in the UAE, 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.



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 employees. All directors have been briefed on the subject.

The Board of Directors delegates the approval of this statement on its behalf to the Group Commercial Director of the company.

For and on behalf of McLaren Construction Ltd

A handwritten signature in black ink, appearing to be "M. Archer", written in a cursive style.

Maurice Archer
Group Commercial Director