Anti-Slavery Policy

MPB Structures Ltd (hereafter MPB) is committed to ensuring that all workers employed in any capacity, by itself or any supplier of goods and services, are not subject to any form of exploitation. For the avoidance of doubt this policy refers to all forms of labour exploitation up to and including modern slavery.

As part of that commitment MPB will seek to understand the nature of labour supply across its supply chain, seek assurances where required that the risk of exploitation has been considered and addressed, undertake audits and be supportive of any supplier who wishes to raise concerns.

We expect all our suppliers to comply with our expectations and requirements for legal compliance, and to implement similar processes to ensure that their own workforce, whether directly employed, labour only contractors, labour supplied by an agency or through a subcontractor, are adhering to these standards.

All suppliers will be made aware of this policy and all our standard supplier contracts will contain an anti-slavery clause.

Responsibilities

The Company, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable.

MPB will:

(a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation

(b) be clear about our recruitment policy

(c) check our supply chains, to include conducting audits

(d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us

(e) ensure we have in place an open and transparent grievance process for all staff

(f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare

(g) publish a modern slavery statement in line with the requirements set out within s54 of the Modern Slavery Act 2015

(h) provide specific training to all staff members who are involved in managing recruitment and/or managing any part of the workforce, along with more general awareness training to all staff (including tool box talks)

Managers will:

(a) listen and be approachable to colleagues

(b) respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;

(c) remain alert to indicators of slavery

(d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do

Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

(a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery paragraph 6 below)

(b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or illtreated

(c) tell us if you think there is more we can do to prevent people from being exploited

Risk and Due Diligence

MPB will assess its risk and take steps to gain a greater understanding its supply chain in relation to the workforce used. This will be for the those who are engaged directly and for the workers provided through any subcontract arrangements directly engaged.

MPBs due diligence approach will seek assurance that the risk of labour exploitation has been considered by suppliers of goods and services (which includes provision of any labour only services) and that recruitment, right to work, payment of wages and freedom of movement all meets the appropriate statutory guidance.

The due diligence programme may include any, all or a combination of:

(a) Required completion of questionnaires relating to the risk of labour exploitation and/or illegal working

(b) Desk based compliance checks in relation to recruitment, pay and relevant terms and conditions

(c) Face to face audits of suppliers, either by MPB staff or independent auditors

(d) Worker interviews

(e) Site based spot checks on right to work and worker welfare related issues

General Recruitment

MPB will:

(a) always ensure all staff have a written contract of employment.

(b) always ensure staff are legally able to work in the UK.

(c) provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

(d) follow our reporting procedures (See below) if we suspect someone is being exploited.

Reporting slavery

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with your line manager or a Director of MPB who will decide a course of action and provide any further advice in accordance with the Company policy.
It is important to recognise that not all victims will consider themselves to be subject to labour exploitation and approaching an individual (or anyone thought to be involved in their exploitation) may put the potential victim at an increased risk.

It is therefore important that in the absence of an immediate danger, you discuss your concerns first with your line manager or Director of MPB before taking any action.

The lead for this policy is MPBs Safety & Sustainability Director who should be contacted in order to co-ordinate reporting to the authorities or the Modern Slavery and Exploitation Helpline 08000 121 700

Policy review

We will review our Anti-slavery Policy regularly, at least annually. We will provide information and/or training on any changes we make.

Martin Cragg
Safety & sustainability Director
MPB Structures Limited
29th October 2026