



M GROUP

Modern slavery and human trafficking

This statement relates to the actions and activities of M Group and its operating businesses as set out at the start of this statement, during the financial year 1 April 2024 to 31 March 2025.

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Board approval

This statement has been approved by the organisation's Operational Board who review and update it at least annually.



Andrew Findlay, Chief Executive

Dated: 24 April 2025

Operating businesses across the Group covered by this policy include: M Group Water (Network Infrastructure), M Group Water (MEICA Specialist), M Group Water (MEICA Projects), M Group Water (MEICA Maintenance & Projects), BGEN, Building Engineering Solutions, Norwood Group, BFP Services, Satisfy Recruitment Services, M Group Energy (Agility Eco Services), M Group Energy (Bierce Surveying), M Group Energy (Infrastructure), M Group Energy (Network Infrastructure), M Group Energy (Metering), M Group Energy (Data Insight), Seeka, M Group Telecom, M Group Telecom (Fixed Network Solutions), M Group Telecom (Technology Services), M Group Telecom (Mobile Network Solutions), M Group Transport (Rail & Aviation), M Group Transport (M&E), Antagrade Electrical, M Group Highways, M Group (Plant & Fleet Solutions)

Introduction

This statement sets out M Group's actions to understand all potential modern slavery risks related to the Group and its operating businesses.

We recognise our responsibility to take a robust approach to slavery and human trafficking. Our Group and supply chain are committed to preventing slavery and human trafficking in all its forms.

Organisational structure and supply chain

M Group is privately owned and delivers a range of essential infrastructure services within the water, telecom, highways, rail and aviation and energy sectors operating principally in the UK and Ireland. Our supply chain is mainly located in the UK and delivers a range of utility services and essential products, including aggregates, gas and water supply components, electricity and telecom cables, substation components and telecom equipment.

We also work extensively with subcontractors and plant and equipment providers and who are responsible for service delivery. Several clients supply materials to us directly on a free issue basis, for which they are responsible for sourcing via their own supply chain partners.

Countries of operation and supply

The organisation principally operates in the United Kingdom and Ireland with limited activities for clients in Europe and Africa.

Risk activity assessment

Having assessed the risk in relation to slavery or human trafficking as predominately from our supply chain, we consider that:

We operate almost exclusively in the UK and Ireland and most of our supply chain partners are based in the UK. We consider the overall risk of slavery and/or human trafficking to be very low. This low risk is reflected by the absence of any incidences of modern slavery reported in the supply chain for the relevant financial period.

For all direct employees, we carry out Right to Work in the UK checks and pay minimum wages or above in accordance with UK government legal guidelines in respect of the National Minimum and National Living Wage.

For all indirect workers, we carry out a Health & Safety and Contract Familiarisation Induction ahead of them starting work where we check their identity, qualifications and competence.

We work with our clients through regular client-led audits of our obligations under this policy and support the client in our shared duties to control modern slavery through our effective supply chain management.

We've partnered with an external agency to undertake auditing of Ethical Business Practices on our top PPE suppliers. These audits give us opportunity to collaborate with our suppliers on compliance and improve practices. Audit topics include Modern Slavery, Equal Opportunity, Rates of Pay, Working Hours, and more.

Risk activity process

We run a rigorous supply chain evaluation process across our Group, which includes compliance checks and risk assessments, to ensure our service partners meet or exceed our modern slavery and human trafficking policy requirements.

During the financial year 2024/25, 1098 partner organisations completed the process and gained our approval.

Where we've identified a material risk, we've conducted supply chain assessment audits to ensure compliance with the agreed policies.

We'll continue to monitor our supply chain partners and conduct assessment audits to identify if there is a potential risk of slavery or human trafficking.

Responsibility

Responsibility for the organisation’s anti-slavery initiatives is as follows:

Policies: Chief People Officer and Chief Procurement Officer.

Risk Assessments: The Chief Procurement Officer is accountable for assessing the risk of slavery or human trafficking within the supply chain.

The Chief People Officer is responsible for assessing the risks for the people aspects of our business such as recruitment and business operations.

Both of these aspects are part of the organisation’s overall Risk Management and Governance process.

Investigations/due diligence: The Internal Audit function is responsible for carrying out investigations if a concern is raised (either directly, or via the whistleblowing hotline) supported by the People team and divisional Operational teams.

The Group procurement function and operating businesses’ commercial teams are responsible for making sure the Group’s policies are communicated to the supply chain partners and form part of the supplier assessment process.

Training: Senior leaders are required to complete mandatory learning/refresher training in modern slavery and human trafficking. During the financial year 2024/25, 4,697 employees completed the training.

Due diligence

Resourcing policy

We recognise that any business providing contingent labour and recruitment services presents unique risks. We have engaged a managed service provider to oversee the supply of temporary labour. The managed service provider undertakes regular audits of supplying employment agencies to verify their operational processes and personnel, ensuring they are capable of recognising, preventing, and reporting modern slavery.

Regular compliance checks are undertaken to verify workers are being paid in line with minimum wage legislation, that there are no unlawful deductions, and no fees are being charged for work finding services.

We undertake due diligence when considering taking on supply chain partners, and regularly review our existing partners. Our due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new partner.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where material risks are identified, taking steps to improve substandard suppliers’ practices, including providing advice to suppliers and requiring them to implement action appropriately.
- Invoking sanctions against suppliers that fail to meet our expectations, including termination of the business relationship.
- Our supply chain contracts require our direct supply chain partners incorporate and adhere to modern slavery standards in their operating practices.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy

We encourage our people, clients, and members of our supply chain to report any concerns related to direct activities.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Our whistleblowing procedure is designed to make it easy to make disclosures, without fear of recrimination or retaliation.

Our people, clients, or others who have concerns can use our confidential helpline provided by Navex Global. In the financial Year ending 2025, we received one report of potential concern which is under investigation at the point of this statement being prepared.

The Way We Work

Our Group code outlines the actions and behaviours we expect of our people when representing the organisation. We strive to maintain the highest standards of colleague conduct and ethical behaviour.

Procurement policy

We’re committed to ensuring that our supply chain adheres to the highest ethical standards. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with the supply chain to ensure they meet our standards.

We inform our supply chain of our requirements relating to ethical business practice and compliance by providing them with a copy of ‘The Way We Work’ during the engagement process. Violations of our The Way We Work policy, will lead to the termination of the business relationship.

As part of our supply chain evaluation, we ask candidates if they have a policy/statement that sets out the steps their organisation has taken during the financial year to prevent slavery and human trafficking from taking place in any of their supply chains or in any part of their own business.

If any potential supply chain partner is unable to demonstrate their policies, (for example, if they are below the threshold of having their own policy as a legal requirement) we ensure that they agree to act in accordance with our policy.



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