



Maxi Construction Limited

# Modern Slavery Policy Statement and Procedures

## Company Background

Maxi Construction Limited is an established building contractor providing new build, refurbishment, alteration, extension and fit-out works in most market sectors including community, education, industrial, local authority, office, retail and sports & leisure to a project value of circa £5m with an annual turnover of £17m.

## Statement of Commitment

We are committed to acting ethically, with integrity and to maintaining procedures, systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business.

These procedures demonstrate our 'zero tolerance' approach to modern slavery and human trafficking in our business.

Our approach to assessing and managing the risk of modern slavery and human trafficking is outlined as follows:

### Due Diligence

The highest risk of a Modern Slavery and human trafficking incidence being identified would be within our Tier 1 Subcontract Supply Chain and Tier 2 Labour Agency Suppliers.

With the appropriate Due Diligence procedures in place this risk is mitigated and considered to be a very low risk.

### Due Diligence Procedures

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company's due diligence and reviews include:

1. Mapping the supply chain to broadly assess particular risks of modern slavery and human trafficking
2. Evaluating the modern slavery and human trafficking risks of each new suppliers
3. Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping
4. Participating in collaborative initiatives and provide employee training including a focus modern slavery and human trafficking.
5. Review, consideration and reporting on the outcomes of any negative or positive findings

### Control Measures

The control measures we have in place include:

#### Subcontractors

- Competency Assessment is completed prior to any order being placed and is updated/ reviewed on an annual basis.
- Each individual working on site is inducted on site by a Maxi representative.
- Each individual working on site provides details that allows us to assess their competence e.g. training records and Emergency Contact details
- Ensuring that any security companies employed are either registered with SIA (Security Industry Authority) or as a minimum have commenced the registration process.

#### Agency Labour

- A core of recognised Established Companies all of whom have Modern Slavery procedures in place are appointed to supply temporary agency labour.
- Each individual working on site is inducted on site by a Maxi representative.
- Each individual working on site provides details that allows us to assess their competence e.g. training records and Emergency Contact details



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### Payment

- We do not make cash payments to any of our supply chain
- We enter into formal contracts with each supplier which have standard terms for payment into company bank accounts and not individual accounts.

### Relevant Policies

We have relevant policies in place which include:

- Ethics Policy
- Direct Employee Contract of Employment
- Equality & Diversity Policy
- Workforce Communication Policy

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Maxi Construction's modern slavery and human trafficking statement for the financial year ended 30 September 2020.

It was approved by Maxi Construction's board of directors on 7 February 2023.

Signed:  J C Aitchison

Position: Managing Director

Date of Issue: 7 February 2023

Date of Review: February 2024

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