

# Anti-Modern Slavery and Human Trafficking Policy

## 1 Introduction

McLaren Construction Ltd. is committed to upholding the highest standards of business integrity and ensuring that modern slavery and human trafficking have no place within our operations or supply chain. This policy outlines our responsibilities, commitments, and expectations to mitigate the risk of modern slavery and foster an ethical and accountable culture throughout our business relationships.

## 2 Acknowledgement of Responsibility

McLaren recognises its responsibility under the UK Modern Slavery Act 2015 to proactively address and mitigate modern slavery risks in our supply chain. We understand that achieving this goal requires collaboration, transparency, and continuous improvement. Our commitment extends to ensuring that workers' rights are respected and upheld at every level of our supply chain.

## 3 Policy Objectives

Our anti-modern slavery objectives focus on three key areas:

1. **Embedding Ethical Principles:**
  - Promote awareness of modern slavery risks among our employees and supply chain partners.
  - Integrate ethical considerations into procurement processes and decision-making.
2. **Mitigating Supply Chain Risks:**
  - Identify and address vulnerabilities within our supply chain, especially in high-risk regions or sectors.
  - Ensure due diligence is conducted at all levels of our supply chain.
3. **Fostering Accountability:**
  - Require suppliers to adhere to our ethical standards and support their efforts to address modern slavery risks.
  - Monitor compliance and implement corrective actions where necessary.

## 4 Commitments to Tackling Modern Slavery

McLaren is committed to:

1. **Conducting Risk Assessments:**
  - Carrying out detailed assessments to identify and mitigate risks within our supply chain.

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- Collaborating with independent organisations to improve processes for identifying and addressing risks.
2. **Training and Awareness:**
    - Ensuring all employees involved in procurement complete the ‘Tackling Modern Slavery’ e-module and the CIPS ethical procurement training.
    - Offering suppliers access to similar training or requiring evidence of their own training initiatives.
  3. **Transparent Reporting:**
    - Encouraging reporting of potential ethical violations through a safe and confidential whistleblowing policy.
    - Annually reporting on actions taken to combat modern slavery and the effectiveness of these measures.
  4. **Supplier Collaboration:**
    - Supporting suppliers in building their capacity to address modern slavery risks within their operations.
    - Sharing resources and expertise to foster collective responsibility and action.

**Expectations for *Supply Chain* Commitment**

To uphold our ethical standards, McLaren requires all suppliers to:

- Conduct due diligence within their own supply chains and address any identified risks or violations promptly.
- Demonstrate adherence to modern slavery legislation and provide evidence of compliance upon request.
- Develop or adopt anti-modern slavery training programmes for their workforce.
- Cooperate with McLaren in addressing any incidents or risks identified.

## 5 Monitoring Supplier Adherence

McLaren ensures compliance through:

1. **Prequalification and Audits:**
  - Requiring suitable suppliers to complete a Modern Slavery Assessment Tool during onboarding.
  - Conducting regular audits, site visits, and checks to verify adherence to anti-modern slavery policies.
2. **Performance Metrics:**
  - Tracking supplier training completion rates and other key performance indicators.
  - Monitoring suppliers’ efforts to address and mitigate risks.
3. **Supply Chain Mapping:**
  - Increasing transparency by tracing the origins of goods and services across all supply chain tiers.
4. **Continuous Improvement:**

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- Partnering with independent organisations such as 'Unseen' to review and enhance our anti-modern slavery efforts.
- Implementing corrective actions and updating processes as necessary.

## 6 Approval

The Board of Directors delegates the approval and oversight of this policy to the Group Commercial Director. The policy will be reviewed annually to ensure alignment with legal requirements and best practices.



Paul Spiller, Group Commercial Director  
For and on behalf of McLaren Construction Ltd.  
Signed 17 February 2026.

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