

Modern Slavery and Human Trafficking Statement

1. Statement

- 1.1. This statement meets the requirements of Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps McCann Group (McCann) have taken to ensure that modern slavery and human trafficking is not taking place in its business or any part of its supply chain.
- 1.2. McCann has put in place fair and transparent recruitment and procurement procedures in relation to fair labour practices and modern slavery in accordance with relevant legislation and standards.

2. Risk

- 2.1. McCann has identified the following areas of its business where there is a risk of modern slavery and human trafficking taking place:
 - Construction ground works labour agencies
 - Electronics manufacturing based in Saudi Arabia, Turkiye, UAE, Russia, Kuwait
 - Unskilled roles such as cleaners and security
- 2.2. Initial assessment of modern slavery risk will be managed through our Safe Contractor onboarding system managed by Alcumus. An annual review of our supply chain's awareness, exposure and initiatives to remove risk will be managed by McCann. Our supply chain is expected to manage their supply chain in accordance with our requirements and be open to auditing by McCann where high risks are identified.

3. Controls

- 3.1. McCann's HRP08 Modern Slavery Policy, CMA04 Ethical Conduct Policy, CMA22 Whistle Blowing policy, Supplier Code of Conduct and IMA1 Roles and Responsibilities document, identifies modern slavery control measures and places specific duties on McCanns and its supply chain to prohibit modern slavery in line with the Universal Declaration of Human Rights, the conventions of the International Labour Organisation and the UN's Guiding Principles on Business and Human Rights. Adherence to these policies is mandatory for McCann employees and forms part of our Terms and Conditions with our supply chain.
- 3.2. McCanns will carry out appropriate due diligence checks through internal auditing, supply chain risk mapping and supply chain onboarding to ensure that its own workforce, subcontracted labour and suppliers are aware of the risks from modern slavery and they are taking steps to ensure they are free from modern slavery. Breaches of these policies by employees may result in disciplinary action and in the case of Suppliers may result in contract termination.
- 3.3. McCann will carry out external audits of selected suppliers to monitor and assess the risks of modern slavery. McCann will seek to avoid any instance of modern slavery in its operations through company induction, site induction, employee awareness training, due diligence checks, supply chain onboarding and through supporting a whistle blowing policy.

4. Effectiveness

- 4.1. In 2025 McCann collected data under the following headings from our supply chain to help monitor compliance with this statement:
 - Modern slavery statement - Required (Turnover >£36m)
 - Modern slavery statement - Not Required (Turnover <£36m)
 - Prosecutions for modern slavery
 - Risk Assessment of modern slavery
 - Operations in high-risk countries
 - Operations in high-risk sectors
 - Utilisation of high-risk nationality groups
 - Independent modern slavery Audits
 - Delivery of modern slavery awareness training
 - Whistle blowing notifications
- 4.2. The 2025 data identified that there were no instances of noncompliance for in scope organisations.

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4.3. In 2026 we will work with the out of scope organisations (Turnover <£36m) to improve the implementation of our policies and procedures.

5. Awareness

5.1. McCann will ensure that its employees and Suppliers are actively informed of the risks of modern slavery and how to identify them. Everyone is expected to report any concerns, without fear of reprisal, and managers are expected to act upon these reports.

5.2. McCanns provides training for all employees on modern slavery awareness through the Supply Chain Sustainability School resources.

5.3. The requirements made of Suppliers regarding modern slavery are communicated and contracted upon through our Supplier Code of Conduct, Supplier onboarding process and our Terms and Conditions that are issued with every contract. McCanns expects all Suppliers to conduct right-to-work checks of their workforce in accordance with HMRC IR35 rules and the Immigration, Asylum and Nationality Act 2006.

6. Due Diligence

6.1. The responsibility for McCann's modern slavery compliance policies and procedures lies with the Managing Director. The MD has assigned duties to the Head of Compliance and Purchasing Manager to actively define and carry out the company's anti-modern slavery programme.

6.2. McCann uses due diligence surveys, minimum wage checks and project audits to measure effectiveness of control measures in ensuring that modern slavery is not taking place on site or in the supply chain.


6.3. McCann operate a Whistle Blowing Policy which encourages employees and supply chain to raise concerns on legal or ethical breaches without reprisal to McCann management. External disclosure may be advised in some cases.

7. Working with Others

7.1. McCann will work in partnership with Suppliers to tackle and combat the threat of modern slavery and human trafficking across the construction industry and throughout our supply chain, in accordance with international environmental, social and ethical standards.

7.2. McCann group fully welcome and support other contractors in conducting modern slavery audits and risk assessments on its own policies and supply chain,

This statement was agreed by the McCann Group Board on 12 February 2026.
It is reviewed annually and published on our website.



John McCann
Managing Director (McCann Group)

Date Last Reviewed:
February 2026