

# Modern Slavery & Human Trafficking Statement

Version	Changes	Originator	Approved
I		TH	B Hamer 25/06/2025

## Introduction

This statement sets out Future Water's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2025 to 31 December 2025.

As part of the construction sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Future Water MJJV Ltd which is a Joint Venture partnership between J T Mackley and Jones Bros. Ruthin (Civil Engineering) Co. Ltd.

J T Mackley is a provider of civil engineering services in the construction industry. We are part of the Van Oord group of companies (Group), and our ultimate parent company is Van Oord NV which has its head office in the Netherlands located at Schaalddijk 211, 3063 NH Rotterdam. Mackley has around 170 employees and operates in the United Kingdom and, from time to time, other countries.

We have an annual turnover of between £50 and £55 million.

Mackley supply chains include materials supplied by suppliers principally from the United Kingdom but we do have a small number of suppliers from various parts of the world.

Jones Bros is a provider civil engineering contractors with a wealth of experience across a broad range of sectors. Jones Bros has around 550 staff and operates across the United Kingdom, with the Group's head office located in North Wales.

Jones Bros provide most of the labour and staff resources required to fulfil the civil engineering project requirements through our directly employed workforce. Our supply chains includes the sourcing of plant, materials, professional services and subcontractors and additional staff and labour where required.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

We have in place general systems and controls to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains. (Please also refer to, for example, JTM-HR-25 Safeguarding policy).
- We use only specified, reputable employment agencies to source labour and verify the practices of any new agency before accepting workers from that agency.
- Monitor potential risk areas in our supply chains through due diligence.
- Protect whistle-blowers. (Please refer to JTM-HR-19 Whistleblowing Policy)

- We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. 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 for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact 01273 492212 to speak confidentially to HR or to send an email to [HR@mackley.co.uk](mailto:HR@mackley.co.uk)
- Employee code of conduct - our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- Promote corporate social responsibility which recognises our wider social and environmental responsibilities.

### Supplier Adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of the routine training of applicable staff and the issuing of relevant policies and guidelines. We also assess new suppliers as regards anti-slavery and human trafficking practices or potential practices;

We have a dedicated team, which consists of involvement, where considered appropriate, from the following departments:

- QHSE.
- Audit and compliance.
- Human resources.
- Procurement department.

### Due Diligence

We undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Reviewing on a regular basis all aspects of the supply chain mapping.
- Conducting supplier audits or assessments through the organisation's own staff/third party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Creating an annual risk profile for each supplier.
- Perform relevant background checks for all prospective directly employed members of staff.
- Where possible we build long standing relationships with local suppliers and subcontractors and make clear our expectations of business behaviour.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- Using our secure commercial database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all supervisory staff to complete training on modern slavery every 2 years.
- Tool box talks to be delivered every 6 months on Bullying, harassment and whistleblowing.

## Training

We require all staff to complete our e Learning training on modern slavery as part of a wider education programme, this is repeated every 3 years.

We require all supervisory staff to complete an online training course every 2 years and there is a toolbox talk which is carried out every 6 months.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

## Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by putting up posters across our premises.

The posters explain to staff:

- the basic principles of the Modern Slavery;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline. (08000 121 700) or 101 local police if assessed to be a risk but not an emergency
- 999 if suspect emergency.

### Board approval

This statement was approved in June 2025 by our board of directors, who review and update it annually.

Director's signature (for Future Water and Mackley):

A handwritten signature in blue ink, appearing to read "B Hamer".

Director's name: Ben Hamer

Date: 25<sup>th</sup> June 2025

Director's signature (for Future Water and Jones Bros):

A handwritten signature in black ink, appearing to read "J Griffiths".

Director's name: Jane Griffiths

Date: 16<sup>th</sup> July 2025