

Modern Slavery & Human Trafficking Statement

V2 – June 2026

Document Quality Control

REV	CHANGES	ORIGINATOR	APPROVED BOARD	BY
2.0	Version 2.0	JA/TD	June 2026	
1.0	Version 1.0	JA/TD	June 2025	

Policy Statement

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 April 2026 to 31 March 2027. 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 taking steps to ensure 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 Mackley and Jones Bros. Ruthin (Civil Engineering) Co. Ltd.

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 Schaarwijk 211, 3063 NH Rotterdam. Mackley has around 230 employees and operates in the United Kingdom and, from time to time, other countries.

We have an annual turnover of around £80 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 Civil Engineering UK is a leading civil engineering contractor with over 70 years of experience delivering infrastructure projects across a wide range of sectors throughout the United Kingdom. Employing around 550 people, the company operates nationwide, with its headquarters located in North Wales.

Jones Bros primarily delivers projects using its directly employed workforce, providing the skilled labour and professional expertise required to successfully complete civil engineering works. This approach is supported by a robust supply chain that provides plant, materials, professional services, subcontractors and additional labour resources where necessary.

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:

- 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) June 2026 Page 2 of 5 Version No. 1
- 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 / [01824 703661](tel:01824703661) to speak confidentially to HR or to send an email to HR@mackley.co.uk / hrdept@jones-bros.com.

- 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. We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct may lead to the termination of the business relationship.

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Our HR Team is responsible for reviewing and updating and implementing policies. Specialised websites and industry standards are followed.
- **Training:** Toolbox talks are initiated and updated in line with annual review. 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.

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:

- HSEQ
- Audit and Compliance
- Human Resources
- Procurement Department

Relevant Policies & Processes

We operate the following policies and processes 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 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 the HR department on 01273 492212 / 01824 703661 in confidence.
- **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 operating abroad and managing its supply chain.
- **Supplier Appraisal** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the highest standards. Supplier performance is monitored on a weekly basis and any concerns raised. However, serious violations of our supplier appraisal will lead to the termination of the business relationship. All suppliers are required to complete the appraisal if they do not have the relevant ISO accreditation. Our team carries out external supplier audits to verify compliance with the completed supplier appraisal.
- **Agency workers** We use only specified, reputable employment agencies to source labour and always verify their practices before accepting workers from that agency. It is a requirement on site for all workers to have the appropriate level of skill. Site supervisors check the workers against the CSCS cards to ensure that they have the required skill/qualifications to be on site.

Due Diligence

We undertake 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:
- Require all supervisory staff to complete training on modern slavery every 2 years.
- Deliver Toolbox talks on Bullying, Harassment, Whistleblowing, Modern Slavery and Human Trafficking to be delivered every six months.

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.

Raising Awareness 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 Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- 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
- to call 999 if the suspect an emergency suspected

Monitoring and review

This statement is reviewed annually and, if necessary, amended to ensure that it remains effective. The Company reserves the right to amend and update this statement at any time.

Individuals

To understand and adhere to all aspects of this statement

This statement has been approved and authorised by our Board of Directors on:

Sign here

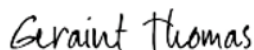


Name: B Hamer

Position: Director for Mackley and Future Water

Date: June 2026

Sign here



Name: G Thomas

Position: Director for Jones Bros and Future Water

Date: June 2026



Jones Bros
www.jones-bros.com

Mackley
www.mackley.co.uk



**Engineering a
sustainable future**

