

# MJ GLEESON PLC

## GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION

At MJ Gleeson plc we are committed to maintaining the highest ethical standards in all our relationships across all our businesses. Our reputation is extremely important to us and is built around us maintaining these standards.

MJ Gleeson plc and its subsidiaries (the “**Group**”) recognise modern slavery and human trafficking as an important human rights issue and we are committed to taking appropriate and proportionate steps to ensure human rights are fully upheld within our Group and within our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and constitutes our Group's modern slavery and human trafficking statement for the financial year ended 30 June 2025 as approved by the Board on 26 November 2025.

This statement reports on our organisation and businesses, policies, training, due diligence procedures, risk assessment, effectiveness of measures taken and training. This statement is updated on an annual basis.

### OUR BUSINESS AND OUR SUPPLY CHAIN

MJ Gleeson plc is a FTSE SmallCap company listed on the London Stock Exchange. The Group employs around 700 members of staff and operates from 9 regional offices, all located within the UK.

The Group undertakes two principal activities – building affordable quality homes (Gleeson Homes) and promoting land through the complex planning system to meet the growing need for housing (Gleeson Land).

- (i) **Gleeson Homes:** As our housebuilding activity is labour and material intensive there is a risk both from sourcing materials and the engagement of labour. All our activities are UK based and the majority of our materials come from UK suppliers who must comply with the Act. We are, however, aware that our suppliers may source materials outside the UK. We are also aware that while the majority of our employees and sub-contractors are UK nationals we will also employ or contract with non-UK nationals where the risk of modern slavery may be higher.

- (ii) **Gleeson Land:** Our land promotion business employs a small number of professional / office-based staff and its suppliers are principally professional consultancy businesses. It does not purchase any materials and therefore has a short and limited supply chain.

## OUR POLICIES

We have a dedicated compliance team, which consists of:

- Group HR Director
- Head of Legal and Company Secretary
- Group Commercial Director

All of whom manage the actions in respect of this statement and report directly into the Executive Directors.

We have a Group policy on modern slavery and human trafficking. All employees are made aware of this through inductions, our employee handbook and on our intranet. We also have a robust whistleblowing policy and procedure in place with both internal and external reporting lines, which allows concerns to be reported on a confidential basis and without fear of recrimination.

## EFFECTIVENESS OF OUR PROCESSES

In line with our policy, we expect all employees to remain vigilant in their day to day working and we expect employees to report any concerns that they have. Senior managers are expected to take appropriate action where a concern is raised. Where we identify an issue with a supplier or sub-contractor, we will discuss the issue with them and agree what actions are to be taken. We will then monitor these actions on an ongoing basis.

## STEPS WE HAVE TAKEN IN THE YEAR:

### 1. Group Anti-Slavery and Human Trafficking Policy and Risk Assessment

We have conducted an annual review of our Group policies on Anti-Slavery and Human Trafficking and Human Rights, and both remain fit for purpose. The policies have, and continue to be, implemented throughout the business. We also conducted an annual review of our risk assessment.

## 2. Real Living Wage Accreditation

We have achieved a further year's accreditation from the Real Living Wage Foundation. This means that we pay all of our colleagues and subcontractors at least the Real Living Wage, which exceeds the National Living Wage (set by Government).

## 3. Supplier Due Diligence

We have zero tolerance to slavery and human trafficking and want to ensure that our supply chain carries the same values. In the year, we enforced the existing safeguards within our supplier prequalification process which ensures that no supplier or contractor can provide services to Gleeson before they have completed our prequalification questionnaire (which asks specific questions about adherence to anti-slavery and human trafficking laws and regulation) and have provided satisfactory documentation. This involves suspending any payments until compliance has been demonstrated.

## 4. Staff Recruitment

We remain vigilant in actively enforcing our policy on recruitment, which ensures that upon commencement of employment, we check and audit that all employees are eligible to work in the UK and that they know their rates of pay, working hours, holiday entitlements and any other benefits. Individuals are not eligible to commence their employment until they have passed their right to work checks.

## 5. Staff Training and Induction

We have a mandatory modern slavery e-learning module which provides training on how to identify, manage and prevent modern slavery within the workplace. This is undertaken by all new employees as part of their mandatory introductory training and is repeated every year. We continue to monitor and report compliance monthly to the senior management team.

Upon induction our employees also have access to our Employee Handbook which contains our Anti-slavery policy and related information.

## 6. Staff Awareness

We have issued communications to the business which raise awareness of modern slavery, including advice on how issues or suspicions can be reported, and provide important reminders about the risks of modern slavery within the workplace. We continue to ensure that all new office buildings and site offices display posters on company notice boards.

## 7. Whistleblowing

We have a mandatory modern slavery e-learning module on the importance of whistleblowing. We communicate the importance of being alert to wrongdoing in the

workplace to all staff at least annually, and encourage reporting, whether through our internal procedure or our external whistleblowing portal.

This statement is made pursuant to section 54 of the Modern Slavery Act, is approved by the MJ Gleeson plc Board on 26 November 2025 and is signed on its behalf by:

Graham Prothero

A handwritten signature in black ink, appearing to read 'G. Prothero', written in a cursive style.

Chief Executive Officer  
MJ Gleeson plc