

Modern Slavery and Human Trafficking Statement

Introduction

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

Our business

The MJ Gleeson plc group undertakes two principal activities – housebuilding and strategic land trading. These activities are carried out by a number of trading entities over numerous sites / locations, all of which are in the UK.

- (i) 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) Our strategic land 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 Group policy on modern slavery and human trafficking. All employees are made aware of this through our employee handbook and on our intranet.

We ensure that on commencement of employment 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. Other than apprentices, all employees receive, at least, the minimum recommended by the Living Wage Foundation and statutory holiday allowance.

Our policies for engaging with a new supplier require them to confirm they have appropriate policies and procedures in place to manage their and their supply chain risks.

Our Compliance Manager, who reports directly to the CEO, manages the actions in respect of this statement.

Steps Taken

Over the last 12 months we have issued letters to new suppliers and sub-contractors to the business ensuring that they complete and sign the pre-qualification document, which includes the modern slavery testimony, before we agree to deal with them. Those suppliers and sub-contractors who are yet to respond; reminder letters have been sent out and we will continue to chase them until a response has been received.

As part of the ongoing due diligence, we will carry out further risk assessments in 2019 on the various trades working on site. If they are found to be high risk, an audit will then be carried out. Our Build Managers are responsible for carrying out these audits where they will ask the trades to provide relevant identification. Ongoing training is carried out on a risk-based approach. Site Managers and Assistant Site Managers are most likely to spot issues; consequently they are the first to be trained. Refresher training is carried out on an annual basis with existing employees and new employees to the company are encouraged to read the existing policy which is part of the Group's Employee Handbook and included in the policy folder on our Intranet site. We ask all new employees to sign an authorisation form to confirm their understanding and acceptance to the policy which is passed to them as part of their company induction.

All employee participation is encouraged - information on how to spot likely signs of "modern slavery" is posted on all company notice boards, including all site notice boards, with a new accompanying poster.

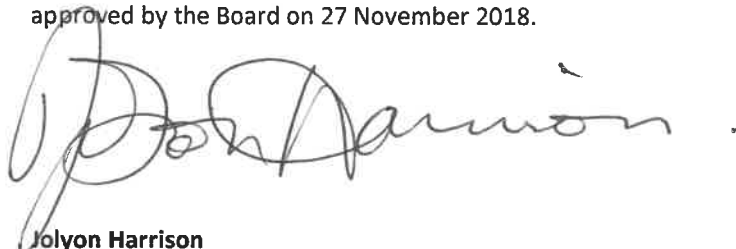
We ask all employees to remain vigilant in their day to day working and to report any concerns they have.

Effectiveness of our processes

In line with our policy we expect employees to report any concerns and management are expected to take appropriate action. Where we identify an issue with a supplier or sub-contractor we will discuss the issue and the corrective plan will be put in place to resolve the situation in a timely manner. We will then monitor this corrective plan on an ongoing basis.

The Group has a "whistleblowing" procedure which allows concerns to be reported on a confidential basis and without fear of recrimination.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the current financial year ended 31 June 2018 as approved by the Board on 27 November 2018.

A handwritten signature in black ink, appearing to read 'Jolyon Harrison', is written over a faint, larger version of the same signature.

Jolyon Harrison
Chief Executive Officer
MJ Gleeson plc
27 November 2018