



Title: Anti-Slavery & Human Trafficking Policy	Effective Date: 21/07/2026	Page: 1 of 4	
	Supersedes: Rev 1	Policy No: HR04	
		Revision No: Rev 2	
PRE EXECUTION			
Approved by: John McQuillan Signature:  Date: 21/07/2026 Title: Director Authorised by: Natalia Satlawar Signature:  Date: 21/07/2026 Title: HR Manager			
REVISION HISTORY			
Previous Revision Number	Date of Previous Revision	Reason for Change	Details of Revision
0	28/04/23	Procedure Update	Updated to a standardised layout. Addition of Sections 3.0, 5.0, 6.0 & 7.0
1	08/05/24	Policy Update	Updated to include: Our organisation's structure, its businesses & its supply chains; Training and capacity building about slavery and human trafficking available to our staff.

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1.0 PURPOSE

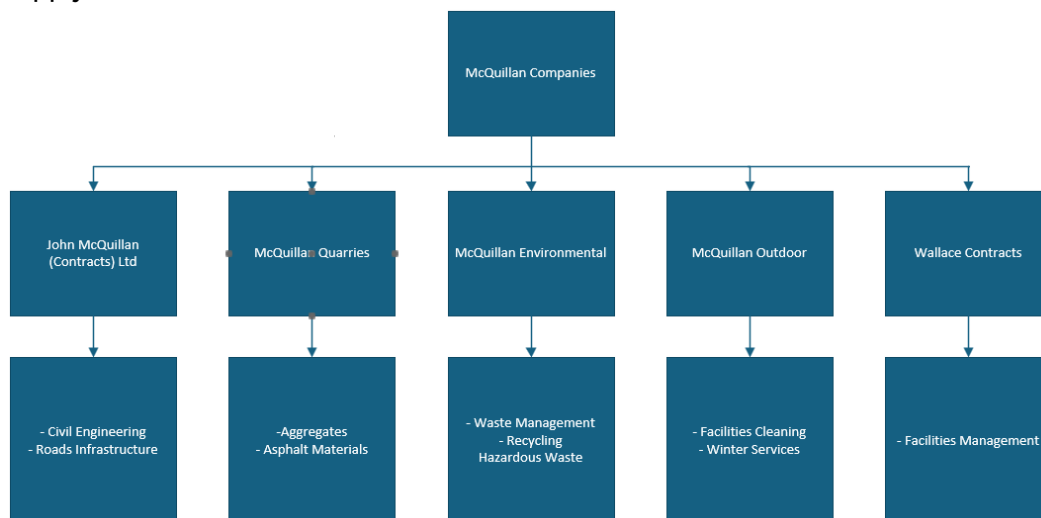
- 1.1 McQuillan Companies strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We require that our suppliers will hold their own suppliers to the same high standards.

2.0 SCOPE

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

3.0 ORGANISATIONAL STRUCTURE

- 3.1 McQuillan Companies is a family-owned, vertically integrated construction, quarrying, environmental and facilities services group based in Northern Ireland. Its structure is designed around controlling much of its own supply chain — from raw materials extraction through to civil engineering delivery, waste recovery and environmental services. Below is an overview of its organisation structure, business divisions and supply chain model.



The group operates through several specialist companies:

John McQuillan (Contracts) Ltd

Core business: Civil Engineering & Construction

Main activities:

- Road construction
- Road resurfacing
- Infrastructure works

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- Public realm projects
- Demolition
- Groundworks
- Utilities and drainage
- Large public-sector civil engineering contracts

Typical clients:

- Government departments
- Local authorities
- Transport bodies
- Utilities
- Main contractors

McQuillan Quarries

Core business: Raw material production

Operations include:

- Quarrying High PSV aggregates
- Production of construction aggregates
- Production of Bituminous materials
- Production of Asphalt-related products

This division supplies materials internally to John McQuillan Contracts and externally to the construction market.

McQuillan Environmental

Core business: Waste management and environmental services

Services include:

- Hazardous waste treatment
- Non-hazardous waste management
- Recycling
- Skip hire
- Waste transfer
- Laboratory testing
- Waste characterisation

Facilities include:

- Hazardous Waste Treatment Facility (Antrim)
- Materials Recovery Facility
- Analytical laboratory

Typical clients:

- Local councils
- Local water company
- Local businesses

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McQuillan Outdoor

Core business: Facilities and environmental maintenance

Services:

- Grounds maintenance
- Outdoor cleaning
- Winter maintenance
- Facility management support

Typical clients:

- Local councils
- Local businesses

Wallace Contracts

Core business: Building maintenance and facilities

Activities:

- Insurance repairs
- Maintenance work
- Landscaping
- Emergency response
- General building works

Typical clients:

- Local councils
- Local businesses
- Large National Insurance Companies

4.0 SUPPLY CHAIN

4.1 The following items are supplied to the company:

Plant & Machinery

- Excavators
- Rollers
- Asphalt pavers
- Crushers
- Screening equipment
- HGV fleet

Typical suppliers:

- Plant manufacturers
- Equipment hire companies
- Maintenance providers

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Materials

Although McQuillan produces many materials internally, external supplies include:

- Cement
- Bitumen additives
- Steel products
- Drainage pipes
- Kerbs
- Concrete products
- Timber
- Fuel
- Lubricants

Specialist Subcontractors

Examples:

- Electrical works
- Utilities
- Temporary Traffic management
- Specialist testing
- Geotechnical services
- Ecology
- Archaeology
- Surveying

4.2 Supply Chain Management

We use the following controls to manage our key supply chain:

- Approved supplier lists
- Supplier evaluation
- SHEQ requirements
- ISO compliance
- Modern slavery checks
- Environmental requirements

McQuillan operates an Integrated Management System aligned with:

- ISO 9001 Quality
- ISO 14001 Environmental
- ISO 45001 Health & Safety

We have in place a Compliance Department of 7 personnel to manage our supply chain and to ensure that our Modern Slavery Policy is implemented as per current legislation throughout our supply chain. This includes:

- 1 No Compliance Manager
- 1 No Human Resources Manager
- 3 No H&S Advisers
- 1 No SHEQ administrators
- 1 No SHEQ System Manager

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4.3 Supply Chain Analysis

Our Compliance Department ensures compliance with the Modern Slavery Act Transparency requirements by completing the following:

- Supply Chain Risk Areas
 - o Which suppliers, sectors or countries are considered higher risk.
 - o Why those areas are vulnerable to modern slavery.
- Due Diligence Process
 - o Detailed supplier onboarding checks.
 - o Ongoing monitoring arrangements.
 - o Audit programme frequency.
- Training
 - o Modern slavery training provided to employees, procurement staff and managers (see further information below)
- Performance Measures
 - o KPIs such as:
 - Number of suppliers assessed.
 - Number of supplier questionnaires completed.
 - Number of audits undertaken.
 - Findings and corrective actions.
- Reporting Mechanism
 - o How workers, suppliers and subcontractors can confidentially report concerns.

5.0 RESPONSIBILITY

- 5.1 It is the responsibility of General Managers or Nominated Deputy to ensure that this policy is appropriately communicated to employees.

6.0 PROCEDURE

6.1 Modern Slavery and Human Trafficking

- 6.1.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

6.2 Commitments

- 6.2.1 McQuillan Companies requires everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

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- 6.2.1.1 We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- 6.2.1.2 The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. Violations of this policy will be subject to disciplinary measures in accordance with McQuillan Companies HR09 Disciplinary Policy and Procedure.
- 6.2.1.3 We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- 6.2.1.4 We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with a Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- 6.2.2 Consistent with our risk-based approach and to ensure adherence to these measures, McQuillan Companies will ask all third parties to complete the Company MP07 – F01A and / or MP07 – F01B Questionnaire Forms designed to evaluate the implementation of anti-modern slavery practices within our operations and supply chains. We may require:
- 6.2.2.1 Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with the Code of Conduct.
- 6.2.2.2 Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code of Conduct.
- 6.2.3 As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant carrying out audits of suppliers for their compliance with our Code of Conduct.
- 6.2.4 If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.
- 6.3 Supporting Our Collaborative Approach to Modern Slavery Act**
- 6.3.1 McQuillan Companies will work in partnership with its supply chain under a collaborative approach which follows a rationalised and coordinated method towards overcoming modern slavery.



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6.3.2 This rationalised approach means that modern slavery act obligations and governance are visible to all prospective suppliers that are working in support of McQuillan Companies and / or are tendering for business:

6.3.2.1 Pre-qualifications and full tender question modern slavery awareness

6.3.2.2 Mandated modern slavery supplier terms and conditions

6.4 This approach is seen as a key enabler committing us all towards aligned Modern Slavery Act principles whilst adhering to the specific requirements of the Act.

6.5 Further information and assistance can be found via the following Modern Slavery Act practical guide:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040283/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

6.6 Review

6.6.1 This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

7.0 REFERENCES

7.1 Modern Slavery Act practical guide:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040283/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

7.2 HR09 Disciplinary Policy and Procedure.

7.3 MP07 – F01A Supplier Evaluation Questionnaire

7.4 MP07 – F01B Contractor Insurance Questionnaire

8.0 APPENDICIES

8.1 N/A

9.0 TRAINING AND CAPACITY BUILDING

9.1 All McQuillan Companies employees are required to read this procedure.

9.2 Training and Awareness

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McQuillan Companies recognises that training and awareness are essential in preventing, identifying and reporting incidents of modern slavery and human trafficking. We are committed to ensuring that all employees, managers and those working on our behalf understand the risks of modern slavery and their responsibilities under this policy.

All employees receive information regarding the Company's zero-tolerance approach to modern slavery and human trafficking as part of the induction process. This training introduces employees to:

- The meaning and forms of modern slavery, including forced labour, bonded labour, servitude, child labour and human trafficking.
- The signs and indicators that an individual may be a victim of exploitation.
- The responsibilities of employees under this policy.
- Reporting procedures and whistleblowing arrangements.
- The importance of ethical recruitment and labour practices.
- Expectations regarding supplier and subcontractor compliance.

Targeted Training:

Enhanced training is provided to employees whose roles expose them to a greater risk of encountering modern slavery issues, including:

Procurement and supply chain personnel.

- Contract Managers.
- Site Managers and Supervisors.
- SHEQ personnel.
- Human Resources personnel.
- Compliance and management teams.

This training focuses on:

- Identifying modern slavery risks within the construction, quarrying, environmental services and facilities management sectors.
- Conducting supplier due diligence and risk assessments.
- Evaluating labour providers and recruitment agencies.
- Escalation and investigation procedures.
- Managing non-compliance within the supply chain
- Understanding legislative and contractual requirements relating to modern slavery

9.3 Supply Chain Engagement

McQuillan Companies works collaboratively with its suppliers, subcontractors and business partners to increase awareness of modern slavery risks throughout the supply chain. As part of our supplier approval and monitoring processes, we communicate our expectations regarding ethical employment practices and compliance with this policy. Suppliers may be required to demonstrate that they have appropriate policies, procedures, training and controls in place to prevent modern slavery and human trafficking.

9.4 Reporting and Support:



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Employees are encouraged to raise concerns where they suspect that modern slavery or human trafficking may be occurring within our operations or supply chain. Training reinforces the reporting routes available to employees and provides guidance on how concerns can be raised confidentially and without fear of retaliation. All reports will be treated seriously and investigated appropriately.

9.5 Monitoring and Continuous Improvement

The effectiveness of our training and awareness programme is reviewed periodically as part of our wider compliance and management system processes. Training content is updated to reflect changes in legislation, industry guidance, emerging risks and lessons learned from internal reviews, supplier assessments and external best practice. McQuillan Companies remains committed to continuously improving the competence and awareness of its workforce in the prevention of modern slavery and human trafficking.