MEARS GROUP PLC HUMANRIGHTSAND MODERN SLAVERY STATEMENT



Version

This statement relates to the financial year ended 31 December 2019. It is published by Mears Group PLC and its relevant subsidiaries in compliance with the UK Modern Slavery Act.

Introduction

The purpose of this Policy is to ensure that Mears Group and its subsidiaries ("Mears" or "the Group") take appropriate steps to ensure that it meets its obligations under the Modern Slavery Act 2015 ("the Act"). The Policy details of our approach to fulfilling our commitment to support the elimination of Modern Slavery.



Our Group

Mears employs circa 7,500 people, providing services across the UK. In partnership with our Housing clients, we maintain, repair and upgrade the homes of hundreds of thousands of people in communities from remote rural villages to large inner city estates. Mears has extended its activities to provide broader housing solutions to solve the challenge posed by the lack of affordable housing and to provide accomodation and support for the most vunerable. We focus on long-term outcomes for people, rather than short-term solutions and invest in innovations that make a positive impact on people's quality of life and on their communities' social, economic and environmental wellbeing by helping clients in new ways.

At group level, we set expectations for how our businesses conduct their activities through the issue of Group policies. Each of our businesses is required to conduct its activities to deliver conformance with these expectations and manage risks associated with its activities, including modern slavery.

This Policy applies to all activities carried out by the Group, in all jurisdictions and with no exceptions. The policy extends to third party suppliers and any other parties working on behalf of Mears.

Our policies on slavery and human trafficking

At the heart of Mears lies a strong sense of responsibility towards improving people's lives. We are proud of our Social Mobility Champion status, creating opportunities and enabling people to develop new skills within some of the most disadvantaged and marginalised communities in the UK.

Mears is committed to supporting the elimination of acts of Modern Slavery and accordingly we acknowledge the Act. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Board of Mears considers that the adherence with the Act is in line with the Corporate Values and Ethical Code which it promotes to all the Group's activities. Mears is further committed to ensuring equal opportunities within all aspects of employments, and values the benefits of diversity within its workforce.

Across all of the Group's activities including its employees, suppliers, partners and subcontractors; forced or compulsory labour is prohibited. Individuals should not be forced into involuntary labour and coercion at work is not acceptable.

We address failures by our employees to adhere to our code and policies; this may involve disciplinary action, up to and including termination of employment. Similarly, if a contractor or supplier fails to act in a manner consistent with our expectations or their contractual obligations, we look to work with them to resolve the issue to improve the situation of the people affected. If a serious breach is found and no corrective action is taken, we reserve the right to terminate contracts.

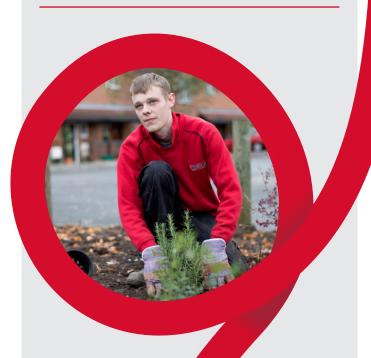
Our suppliers are sourced via a robust due diligence process and audited on an ongoing basis. We have zero tolerance to slavery and human trafficking. The Group makes every effort to ensure that all those in our supply chain, and other parties working on our behalf, accept our values in respect of slavery and human trafficking and take the same approach when conducting their business.

Due diligence processes for slavery and human trafficking

As part of our ongoing duty to identify and mitigate risk we have in place systems and processes to:

- Regularly monitor labour and payroll;
- Include the Act requirements as part of our procurement process clear set out our expectations;
- Provide appropriate training;
- Build strong relationships with our supply chain and make clear the Group's expectations as to their conduct;
- Protect and support any whistle blowers;
- Identify and assess potential risk areas in our supply chains; and
- Monitor potential risk areas in our supply chains and put in place actions to mitigate those risks

Our central HR and procurement functions assist us to have visibility and a better understanding of the risk areas.





Responsibilities

The Group Finance Director is the main board director with primary responsibility for implementing this policy within our wider framework for managing corporate responsibility. Compliance with the Act will be reported to the Audit Committee annually.

Pursuant to the Act, we will update and issue this policy (which for the purposes of the Act should be seen as our slavery and human trafficking statement) annually, to confirm the actions taken to ensure that slavery and human trafficking is not taking place in Mears or within the activities of the Group's supply chain.

Commitments

As part of our Slavery and human trafficking statement and our ongoing commitment towards steps take to address and remedy modern slavery, we committed to a number of actions, that we have detailed the status as in progress or completed. Below is a summary of our existing commitments as well as new commitments.

Further steps

We are proud of the steps that Mears has taken so far to combat slavery and human trafficking, however recognise that this is an area which requires continual monitoring and improvement and we will continue to do this. Steps which we intend to take include:

- continue to raise awareness with staff and our suppliers through a review of resources currently in place; and
- continue to gain a greater understanding of the supply chain practices and procedures of our key suppliers to understand how they address the Modern Slavery Act.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2019. This statement has been approved by the Board of Mears Group PLC and each of its relevant subsidiaries. It was approved by the Board on 21 May 2020.

Andrew Smith Group Finance Director 21 May 2020