



## Modern Slavery and Human Trafficking Statement 2024

### Introduction

This statement is made by Mercury Engineering Limited (“Mercury”) on behalf of the entire Mercury group of companies, noting for the purposes of the Modern Slavery Act 2015 that part of its group includes Mercury Engineering and Building Services Limited, a UK registered company.

Mercury acknowledges the prevalence of modern slavery in the world today. Mercury is committed to driving out acts of modern-day slavery and human trafficking within the construction industry, wherever it may exist. Mercury acknowledges its responsibilities under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services and all those who make up the supply chain within Mercury.

### About Mercury

Mercury operates within the construction industry in various countries predominantly throughout the European Union (EU) and the UK. Depending on the geographical location and industry sector, Mercury provides general contracting, project management, mechanical engineering, electrical engineering, fire-protection, technical and maintenance services. It has a diverse workforce of over 2,200 employees and over 55 nationalities.

### Our Policies

Mercury is committed to acting with integrity in all its dealings, relationships, and supply chains, and takes a zero-tolerance approach to slavery and human trafficking. Hidden labour exploitation is unacceptable in our or any other industry.

To support this commitment, Mercury has developed policies, guidelines, training, monitoring and review mechanisms to inform our employees and suppliers of the values we expect to be upheld while employed or dealing with Mercury. Specific training in relation to modern slavery is rolled out across the company. Mercury has issued further communications and launched a poster campaign, in which it has confirmed that its “Speak Up” confidential hotline for reporting instances of unethical or illegal behaviour includes reporting an actual or suspected instances of modern slavery. The posters also contributed to raising awareness of the issue and behaviours that may signify the presence of modern slavery.

The Mercury Code of Conduct sets out the Group’s commitment to acting ethically and with integrity towards our employees and in all our business relationships. People must be treated with dignity and respect, and, whether employees or supply chain, properly compensated for the work they undertake.

Mercury has also implemented a Supplier Code of Conduct, which outlines Mercury’s principles on ethical procurement. This Supplier Code of Conduct sets out Mercury’s expectations of those who provide goods or services to the Group to ensure they meet applicable legal and ethical standards, including human rights and minimum labour standards.

Mercury is consistently improving its communication of these policies and guidelines to its staff and supply chain partners. These are also subject to continuing review. Mercury will ensure that the publishing of each Modern Slavery Statement is used as an opportunity to create further awareness of modern slavery and each employees’ obligations in respect of same.

## Supply Chain

Mercury's supply chain includes companies and/or goods from outside the EEA and UK. Imported goods from sources outside these territories are potentially more at risk of slavery and human trafficking issues. The level of management control required for these supply sources will be continually monitored in line with our procurement and compliance procedures. As part of our due diligence process during the supplier approval process, Mercury will review, where necessary, the controls that the suppliers have in place to mitigate against the risk of slavery and human trafficking in their organisation. The appointment of a new Head of Procurement in 2023 has provided added impetus to the management of our Modern Slavery obligations vis-à-vis our supply chain.

Mercury's template sub-contracts require all its suppliers to adhere to Mercury's standards and to be compliant with laws and regulations for the countries they operate in and with all human rights, labour and health and safety regulations. These contracts also include audit rights.

## Clients

Mercury notes the blue-chip calibre of its clients and the commitments they have made to act as ethical and responsible corporate citizens across a range of issues and specifically in relation to the issues raised by the Modern Slavery Act 2015 and equivalent laws in the jurisdictions we work in. Their contracts place the highest standards on Mercury in respect of these issues, obligations which we are proud to be bound to and abide by.

## Monitoring & Compliance

Mercury continually assesses and monitors potential risks in our supply chain and adheres to strict risk assessment procedures for all new suppliers. In addition, Mercury regularly conducts audits of our project sites, in line with our compliance programme, to ensure that our policies and procedures are fully adhered to.

Mercury also understands its modern slavery compliance in the wider context of contributing to our economic, social and governance (ESG) obligations and the UN's sustainable development goals (SDGs). For the last two years Mercury has been using an external ESG accreditation platform which includes within its scoring risks associated with modern slavery. As part of this we encourage our supply chain to sign up in order to demonstrate transparently their ESG credentials (including with respect to modern slavery).

Mercury is also conscious of upholding all laws equivalent to the Modern Slavery Act 2015 in the jurisdictions in which it operates, as well as pan-EU legislation, noting the present adoption of the EU Forced Labour Regulation through the European Parliament at the time of writing, prohibiting products (and their components) made with forced labour from being placed, made available on, or exported from, the EU market.

## Training & Awareness

Mercury makes its policies available to all employees, communicating on any relevant changes or updates. To support these policies, Mercury has, and will continue to, provide appropriate training to our employees to ensure business is conducted in an honest, ethical and professional manner. Mercury also provides a Speak Up hotline, available 24 hours a day, 7 days a week in each country we operate, as a confidential reporting mechanism for employees and external stakeholders to report any improper or unethical behaviour. We expressly communicate to our employees that this hotline extends to actual or suspected modern slavery violations through a poster and internal communication campaign.

## Conclusion

Mercury is committed to taking all necessary steps needed to ensure that slavery in any form does not take place within the organisation.

Mercury's approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the initiatives mentioned above during 2024 and beyond.

Mercury shall take responsibility for this statement and its objectives, and it will be reviewed and updated on an annual basis.

This statement has been approved by the Board of Directors of Mercury.

Signed.....

Date.....24/6/2024

**Eoin Vaughan**  
*Chief Executive Officer, Mercury.*