



## **MODERN SLAVERY POLICY**

**This Policy applies to Caddick Construction Limited and all subsidiaries which include; Caddick Construction (NW) Limited, Caddick Construction (Midlands) Limited, Caddick Civil Engineering Limited, and CCL Facades.**

This policy sets out the commitments of our company in relation to modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and our organisation is committed to preventing it in our business activities and ensuring that our supply chains are free from, slavery and human trafficking.

As part of the Construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This policy applies to employees at all levels, directors, officers, temporary agency workers, seconded workers, volunteers, agents, suppliers, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may review and amend this policy at any time. It will be reviewed on a regular basis to ensure it complies with relevant UK legislation.

Changes to this policy will be notified by publishing the updated version on our intranet site.

### **PURPOSE**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms as shown below, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We will raise awareness of modern slavery and our expectations of what should be done to address any issues or suspicions, through this policy and associated training.

There are a number of crimes that are covered under the definition of modern slavery; these are:

- Bonded labour – individuals who are forced into debt by paying to get a job or mandatory equipment or have their passports taken to restrict their movements.
- Forced labour – individuals who are forced to work long hours for little or no pay in poor conditions, under verbal or physical threats to themselves or their families.
- Trafficking – individuals or groups moved from one area to another for forced or bonded practices.
- Criminal exploitation – where a victim is exploited to commit a crime, for example, pickpocketing, shoplifting, drug trafficking, and cannabis cultivation.
- Sexual exploitation – including sexual abuse, forced prostitution, and abuse of children for the production of images or videos.
- Domestic servitude – where an individual is forced to work in private households with restricted freedom and work long hours for little or no pay.

Less commonly identified crimes include organ removal, forced marriage, and illegal adoption.

## **AIM**

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to ensuring modern slavery is not taking place anywhere in our own business or our supply chain.

In our supply chain, we ask our suppliers to implement due diligence for their own suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chain.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all employees to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective and current employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We take a strict approach to acts, actions, and behaviours deemed to be in breach of this policy statement, and any such incidents will be dealt with in accordance with the applicable Disciplinary Procedure. Breaches of this policy statement may amount to gross misconduct resulting in summary dismissal.

We may terminate its relationships with other individuals and organisations if they are believed to have breached this policy.

### **Policies:**

HR is responsible for putting in place and reviewing policies and the process by which they were developed.

- Risk assessments: HR, Procurement, and Operations are responsible for ensuring risk assessments are conducted and reviewed and discussed with the board any concerns for final sign-off.
- Investigations/due diligence: HR is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, and recommendations and actions are presented to the Board for approval.
- Training: HR ensures that everyone within and connected with our business operations understands and responds to the identified slavery and human trafficking risks and completes the companies e-learning before commencing any work with us.

### **Relevant policies**

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy** - We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers, or others who have concerns.

**Employee code of conduct** - Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier/Procurement code of conduct** - We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

- **Recruitment/Agency workers policy** - We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

### ***Due diligence***

We undertake due diligence when considering taking on new suppliers, and regularly review its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- Review on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through our own staff and third-party auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third-party auditor and requiring them to implement action plans.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular "Stronger together" or "Ethical trading" initiatives.
- using the ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

### ***Performance indicators***

We have reviewed our key performance indicators (KPIs). As a result, we:

- require all staff to have completed training on modern slavery by December of each year.
- Developed a system for supply chain verification which has been in place since July 2022 whereby we evaluate potential suppliers before they enter the supply chain; and

- Reviewed our existing supply chains by July 2022, whereby we evaluate all existing suppliers.
- We review and verify all our supply chains annually each year.

## ***Training***

We require all staff within the company to complete training on modern slavery as a module within our wider human rights/ethics/ethical trade e-learning programme.

This is required to be completed within the first week of joining the business and to re-sit annually.

Our modern slavery training covers:

Our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected?
- how to escalate potential slavery or human trafficking issues to HR.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters, and Labour Abuse Authority and "Stronger together" initiative?
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

## ***Awareness-raising programme***

As well as training staff, we have raised awareness of modern slavery issues by distributing flyers to staff, displaying posters across our premises, e-learning platform.

The above explains to staff:

- the basic principles of the Modern Slavery Act 2015.
- how employers can identify and prevent slavery and human trafficking.

- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

## **RESPONSIBILITIES**

### ***Caddick Construction Limited and all subsidiaries***

- Actively works to ensure that the risk of modern slavery within its own business activities, and that of its supply chain, is minimised and will adhere to the requirements of all relevant local and national laws.
- Ensures our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of a business relationship and is reinforced as appropriate thereafter.
- Provides employees and managers with appropriate information and training in order to ensure effective communication and understanding of, and compliance with, this policy.
- Prohibits employees at all levels, directors, officers, and representatives of the business from making threats of violence, harassment, or intimidation, committing acts of discrimination, and confiscating workers original identification documents.
- Prohibits child labour and the use of worker-paid recruitment fees.
- Ensures workers have freedom of movement, freedom of association and the right to resign from their employment with the company.
- Encourages the reporting of any incidents or suspicions by all employees and is committed to taking appropriate action without undue delay.

### ***Employees***

- Must familiarise themselves with this policy and act in accordance with our commitments at all times; undertaking any training that is required of them by the company.
- Must escalate any concerns or issues they may perceive to be in breach of this policy to local management or HR swiftly and in confidence; if it doesn't feel right, tell someone.

- Must co-operate with managers in eliminating any risk of modern slavery and human trafficking within our own activities and supply chain.

### **Managers**

- Have personal responsibility for ensuring this policy is communicated, understood, and applied in their business area; ensuring any relevant training is delivered to all employees within their area of responsibility as required by the company.
- Will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to have been mistaken.
- Must treat concerns raised by employees seriously, investigating and escalating as appropriate and taking any required action without undue delay.

### **Supply Chain**

Our supply chain is made up of suppliers, subcontractors, and consultants across multiple categories. They are required to sign up for the Supplier Charter which is aligned to the Responsible Business Charter and includes requirements to commit to compliance with our ethics, anti-bribery and corruption, and modern slavery and anti-discrimination standards.

The commitments to us include the supply chain organisation:

- conducts its business in a manner that is consistent with the Modern Slavery Act 2015 and fundamental protection of Human Rights which includes implementation of a due diligence procedure for its own supply chain to ensure that there is no forced or compulsory labour, slavery, or human trafficking taking place.
- maintains fair competition and avoids complicity in its business practices.
- ensures there is full compliance with all relevant legislation relating to equality and diversity, in particular, the Equality Act 2010, and is committed to promoting equality of opportunity and diversity within the organisation and its supply chain.

As part of the supply chain management and due diligence requirements the supply chain is committed to transparency and improvement which includes:

- Undertaking an annual assessment and participation in any quality, health and safety, and environmental audits to monitor performance, as required.
- Compliance with all statutory, regulatory, and company reporting requirements.
- Providing information on the provenance of products and being transparent in relation to identification of enterprise risks, processes and working practices

## **MONITORING AND REVIEW**

This policy will be reviewed regularly to ensure our statements of commitment are appropriate and in line with current legislation. We will also review all other policies that may be of relevance to, or in connection with, this policy to ensure our commitments are sustained.

### **Approved**

Master copy signed by:-

A handwritten signature in black ink, appearing to read 'Roadsworks', with a long horizontal stroke extending to the right.

**Construction Group Managing Director**

6 January 2025