

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Policy Statement

At Carmichael^{UK}, we believe that protecting people is not simply a legal obligation; it reflects who we are and what we stand for. Our commitment to 'Placing People First' means ensuring that every person we work with, regardless of their position, is protected, valued, and respected.

'Placing People First' is a commitment we take seriously every day, on every site, and throughout every part of our supply chain. It involves being transparent and trustworthy in everything we do, acting with honesty and integrity, and behaving ethically.

We recognise that anyone, anywhere can be a victim of exploitation and we will not make assumptions based on nationality, appearance or circumstance. In applying our modern slavery and human trafficking policy, we will treat everybody as an individual and not as a category of risk.

This Modern Slavery Policy sets out our absolute zero-tolerance approach to modern slavery and human trafficking in all its forms. It has been developed in close partnership with specialist advice and guidance and shaped directly by people with lived experience of modern slavery.

Carmichael^{UK} has adopted the definition of modern slavery and human trafficking as set out in Section 54 of the Modern Slavery Act 2015. This applies to any conduct that would constitute an offence in any part of the United Kingdom, covering England, Wales, Scotland, and Northern Ireland.

Modern slavery is an umbrella term that includes many aspects of exploitation including forced or compulsory labour; slavery, servitude, and debt bondage; child labour; sexual and criminal exploitation; domestic servitude; and human trafficking. Human trafficking specifically involves the recruitment, movement, or receipt of people through coercion or deception for the purpose of exploitation.

Carmichael^{UK} is committed to combating modern slavery in all its forms and complies with the Modern Slavery Act 2015. We commit to ensuring that our business conduct complies with all applicable UK employment laws, the UN Declaration of Human Rights, and the UN Guiding Principles on Business and Human Rights. Carmichael^{UK} will comply fully with the ETI Base Code including the April 2014 Amendment. Full details of our commitment to upholding the ethical trading initiative standards can be found in the Carmichael^{UK} Ethics and Business Trading Policy.

Modern slavery and human trafficking have no place in our operations or our supply chain and we will continue to always 'Place People First'.

Scope of the Policy

Modern Slavery is a hidden crime. It can be difficult to identify a person subjugated to modern slavery because people who are enduring it may feel that they cannot make their plight known, or they may not understand what modern slavery is.

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Carmichael^{UK} is part of the UK construction industry and is working collaboratively with all our people and our supply chain to raise awareness through education of modern slavery generally, but specifically within our industry, so that it can be understood, detected, and reported.

This policy applies to all employees (full-time, part-time, and temporary), contractors, subcontractors, agency workers, apprentices, volunteers, work experience candidates, and interns who work for or with Carmichael^{UK}. It applies also to all suppliers, business partners, consultants, advisors, charities and organisations who work with or on behalf of Carmichael^{UK}.

We will take immediate action should we identify any indication of the following:

- Abuse of vulnerability or position of power
- Deception, coercion, or intimidation
- Restriction of movement or freedom
- Physical or sexual violence
- Withholding of wages, identity documents, or passports
- Agency or other fees that create debt bondage
- Control of accommodation to maintain dependency

All people and all entities are made fully aware of this policy and their duties and responsibilities under it during their onboarding and as part of their contract with us. Carmichael^{UK} will work only with those individuals and entities who support this policy.

This policy is freely available on our website, along with our annual statement of our approach to modern slavery which outlines in greater detail the steps we are taking to manage the risk relating to modern slavery and human trafficking.

Policy Elements

The Directors believe that carrying out thorough risk assessments, coupled with robust due diligence is the beginning of the process to combat modern slavery in our industry. These are shaped with our lived experience consultants to reduce the chances of missing an important indicator. Educating people through training is the second part of the process to raise awareness to reduce modern slavery and eventually eradicate it from the construction industry supply chain. This is carried out with our lived experience consultants.

Going beyond compliance is an additional element that ensures effective measures capable of tackling the risk through deep mapping, specialised audits and the input of people with lived experience of modern slavery. Finally, Board level accountability with a clear governance model defining individual and collective obligations and duties helps to cement the collaborative approach to tackling the risk.

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Risk Assessments

We conduct regular risk assessments to identify and evaluate the risk of modern slavery within our operations and supply chain. Our approach is not limited to assumed higher-risk areas and therefore we apply consistent scrutiny across all geographical locations, industries, and supply chain relationships. We do this deliberately, to prevent unconscious bias and to ensure that no potential victim is overlooked because their circumstances do not fit a preconceived profile.

Our risk assessments consider, but are not limited to, the following factors:

- The geographical location of our sites and the countries from which workers are recruited
- The sectors and types of work being carried out including labour-intensive or shift-based roles
- The use of third party or umbrella companies to supply workers
- Accommodation arrangements including lodge and subsistence
- Workers who have limited English and who rely on one individual to communicate on their behalf
- Any patterns in payroll, address, or contact information that suggest workers are being managed as a group rather than as individuals

We document the outcomes of these assessments and use them to inform our due diligence, training, and reporting processes and update them from time to time.

Due Diligence

We conduct thorough due diligence assessments of our employees, contractors, suppliers, and business partners to identify and mitigate potential risks of modern slavery within our supply chain. This includes:

- Reviewing supplier and partner policies for alignment with our standards
- Conducting on-site welfare checks and audits
- Undertaking HR and payroll checks to identify irregularities
- Tracking early risk indicators through our dedicated Modern Slavery Response Service
- Engaging directly with workers privately, without supervisors or bosses present
- Embedding Safeguarding Sentinels across our business who are trained to identify and respond to early risk indicators

We continue to monitor all supply chain relationships and will cancel relationships with suppliers who do not meet our standards or cannot demonstrate that their product or supply chain is monitored for modern slavery practices. We require all suppliers and business partners to confirm in writing that they:

- Do not engage in practice that constitutes modern slavery, forced labour, or human trafficking
- Have their own modern slavery policy in place, or will develop one within an agreed timeframe
- Will notify Carmichael^{UK} if they identify indicators of modern slavery in their own supply chain
- Comply with all applicable employment laws, including the National Minimum Wage Act 1998 and Working Time Regulations 1998

Failure to meet these standards will result in suspension or termination of the business relationship.

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Beyond Compliance

Through our Placing People First ethos, Carmichael^{UK} operates beyond compliance and believes that safeguarding is not a box-ticking exercise. To truly meet the TISC 3.2 requirement for effectiveness, the UN Guiding Principles' mandate for meaningful consultation, and the emerging global shift toward Mandatory Human Rights Due Diligence (mHRDD), we embed people with Lived Experience directly into our risk assessment and audit processes. This approach transforms our due diligence from a static checklist into a dynamic, defensible system as evidenced below:

Proving Effectiveness (TISC 3.2):

Regulators now demand proof that anti-slavery measures work in practice, not just on paper. Our Lived Experience Consultants stress-test our supply chain audits, identifying subtle indicators of coercion that standard checklists may miss. This provides the qualitative evidence required to demonstrate genuine impact in our annual statements.

Meaningful Consultation (UNGPs):

The UN Guiding Principles require us to consult those at risk. By partnering directly with lived experience experts, we ensure our risk assessments are viewed through the eyes of the individuals we aim to protect, moving us from bureaucratic compliance to the actual safety and dignity of every worker.

Futureproofing for mHRDD:

As laws shift toward strict liability (e.g., the EU CSDDD), relying on generic third-party audits is no longer a sufficient legal defence. Integrating lived experience expertise creates a defensible due diligence process. It demonstrates a higher standard of care, proving we have taken reasonable steps to prevent abuse and strengthening our position against claims of negligence.

By using the perspectives of those with lived experience, we ensure our due diligence is not just compliant, but truly effective.

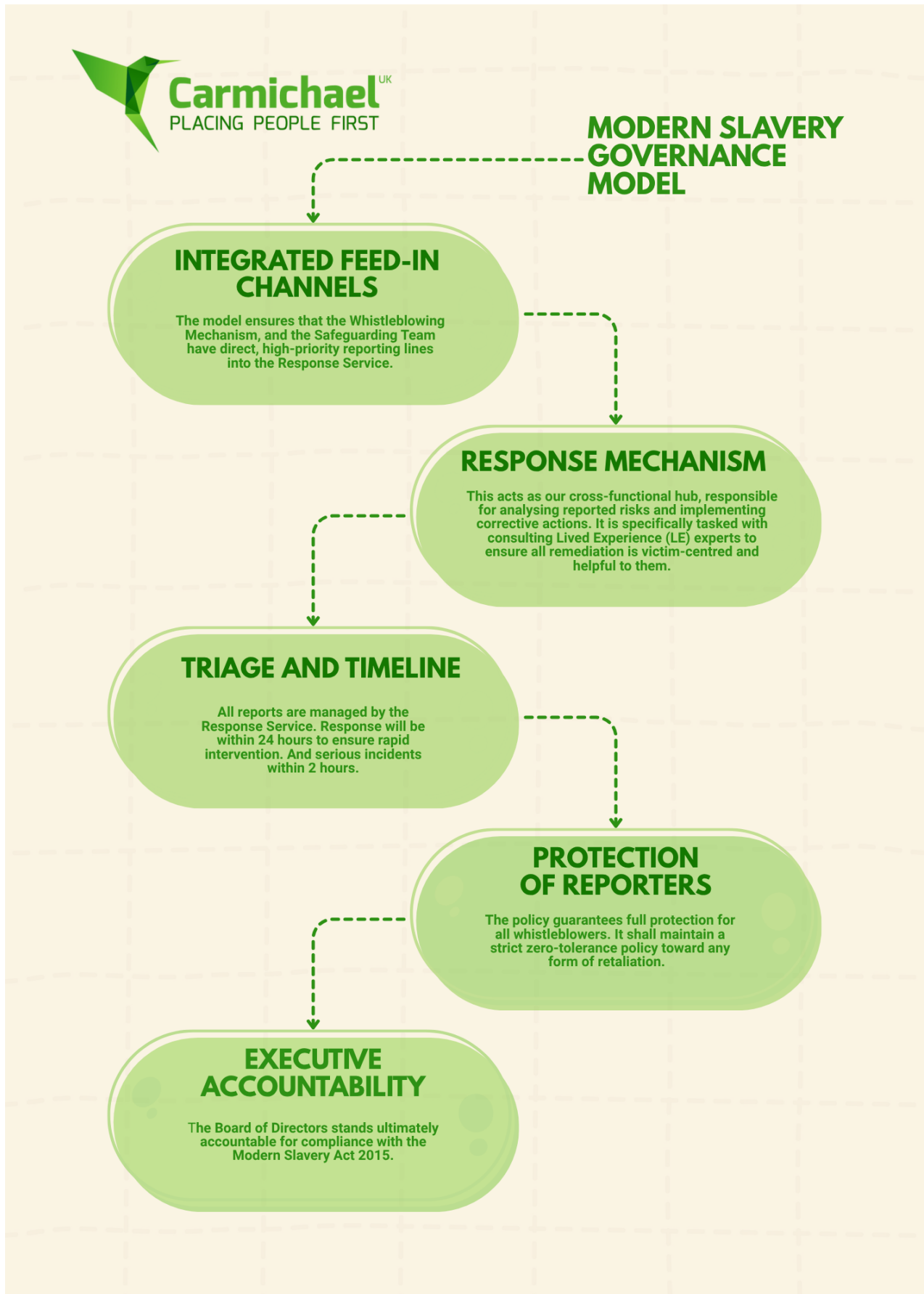
Designated Safeguarding Team and Governance Model

Carmichael^{UK} has a designated Safeguarding Team, known as Safeguarding Sentinels, whose role is to oversee our policies and operations in relation to modern slavery. This team are selected from different departments within the company to ensure that all areas of the business have access to an individual who has a high level of understanding of the issues around modern slavery. These Safeguarding Sentinels meet quarterly to discuss modern slavery and how to combat it and to receive training and awareness on the subject. They are responsible for identifying and responding to Early Risk Indicators, maintaining our relationship with the Modern Slavery Response Service, and ensuring that training and awareness are embedded across the business.

The Carmichael^{UK} Director with overall responsibility for combatting modern slavery is Collette Carmichael. She can be contacted at 0208 522 8888 or hr@carmichaeluk.com. In an emergency, any member of our team can be contacted.

The illustration which follows on the next page represents the elements that comprise our governance model. All members of the Carmichael^{UK} team are able to access the model and all Safeguarding Sentinels are responsible for managing it in collaboration with our Lived Experience Consultants.

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Training and Awareness

All employees and key stakeholders are required to complete compulsory modern slavery training via online modules, which result in certification of completion. This is a mandatory requirement for all staff, including new starters, who are introduced to our approach to modern slavery by a Director during their first weeks of employment.

Working with our retained consultants we run a series of additional workshops including the following:

- On-site lived experience training sessions for managers and supervisors at UK construction sites
- Modern Slavery awareness sessions at our annual staff away days
- Lived Experience toolbox talks delivered on site with lived experience inclusion
- Safeguarding Sentinel workshops to upskill a dedicated staff team to enable them to identify and respond to Early Risk Indicators across sites and administrative operations

We remain committed to continuing and improving our programme of training and awareness.

Modern Slavery Response Mechanism Service & Whistleblowing Service

Working with our retained consultants, we established a dedicated Modern Slavery Response Mechanism for our staff to use. This service provides a structured mechanism for reporting and responding to indicators of modern slavery and is available to all staff and supply chain partners. To ensure effective reporting, we have a dedicated Response Service within the mechanism which provides expert, real-time advice and coordinated responses when risks are identified. All disclosures are handled discreetly, with a focus on protecting personal data and identities from potential retaliatory actions by exploiters. This service is available from 9-5 pm Monday to Friday and in the case of a serious issue, our retained consultants can be contacted directly and can provide guidance and assistance.

In addition to the Response Mechanism, staff and supply chain partners may report concerns in line with our Whistleblowing Policy. All reports submitted through the Modern Slavery Response Mechanism or our Whistleblowing Policy are treated with utmost confidentiality. The identities of those reporting concerns and any individuals identified as potential victims are safeguarded at every stage of the investigation. Protecting potential victim confidentiality is a non-negotiable principle. We recognise the risks that disclosure poses to survivors and take that responsibility very seriously. Our top priority is the safety and dignity of potential victims. Any investigation initiated by a report will be conducted with strict confidentiality to prevent further retaliation from exploiters.

Managing the risk of modern slavery

Carmichael^{UK} will take all necessary steps to work collaboratively with the UK construction industry and our retained lived experience consultants to find instances of modern slavery within our business and supply chain partners.

We also direct employees, workers, and supply chain partners to the following external resources:

Modern Slavery Helpline

0800 0121 700

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UK Government Modern Slavery guidance

<https://www.gov.uk/government/organisations/fair-work-agency>

Align Ltd

<https://www.alignltd.co.uk>

If you believe someone is in immediate danger, call 999 first

In addition to full compliance with the Carmichael^{UK} Modern Slavery & Human Trafficking Policy, Carmichael^{UK} will ensure compliance with associated company policies including its:

- Purchasing & Procurement Policy
- Ethics & Business Trading (Integrity) Policy
- Whistleblowing Policy

Adherence to this policy by our supply chain

Carmichael^{UK} will seek positive assurance from formal suppliers that they agree to comply with the principles of this Policy, our Ethics & Labour Standards Policy, and our Purchasing & Procurement Policy which form part of their contract. Formal suppliers are required to demonstrate that they comply with our policies and that they ensure that contracts they have in place with their own suppliers and subcontractors reflect our standards as a minimum. Where appropriate, we may carry out due diligence on prospective suppliers, as well as auditing existing and prospective suppliers with regards to legal and contractual compliance.

Suppliers, business partners and consultants risk termination of their contract with Carmichael^{UK} if found to be in breach of this policy.

Adherence to this policy by our employees and workers

Disciplinary action may be taken against any employee or worker who acts in breach of this policy. Disciplinary action may include summary dismissal in the case of a serious breach or repeated breaches. In other cases, it may include a verbal or written warning. Such action will be taken in accordance with the Carmichael^{UK} disciplinary procedure. Breaches of this policy may also result in the employee responsible being held personally liable if legal action is taken in relation to modern slavery issues. All staff have a responsibility to be vigilant, looking out for signs of modern slavery in the workplace and reporting these immediately in line with our Whistleblowing procedure, Safeguarding Team, and Response Mechanisms.

For contractors or temporary workers, the assignment may be terminated immediately, and the contractor or temporary worker may not be offered further work until the outcome of the enquiry has been completed.

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Reporting of suspected cases of modern slavery

Any suspected incidence of modern slavery or human trafficking will be taken seriously and may be reported confidentially in line with the company's Whistleblowing Policy or grievance procedure. The employee, contractor or temporary worker can expect full protection when making such a disclosure and will not suffer detriment or reprisals of any type for doing so. Details of all such reports will be recorded by the company and audited at least annually.

Employees who do not wish to refer suspicious behavior or activity to our internal Response Mechanism may wish to contact the Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery, or indeed who may be a victim themselves, to obtain information and guidance on what to do next. If a specific case of modern slavery is identified in the UK, it should be reported to the police immediately on 101. If potential victims are in immediate danger the standard 999 emergency number should be used.

Responsibilities of Carmichael^{UK}

It is the direct responsibility of the Managing Director supported by the members of the Board to ensure compliance with this policy on a day to day basis.

Responsibilities of Employees

All employees of Carmichael^{UK} have a responsibility to accept their personal involvement in applying this policy. They must be familiar with the policy and ensure that it is followed by themselves, other employees, contractors, temporary workers, and suppliers for whom they are responsible.

Approval & Review

This policy will be reviewed once a year to ensure continuing suitability with business requirements. As necessary additional alterations may be made from time to time in the light of legislative changes, operational procedures, or other prevailing circumstances. This policy has been approved by the Board of Directors to ensure it is fit for the purposes of the business in respect of managing the risk of modern slavery and human trafficking.

