

CARMICHAEL SITE SERVICES LIMITED TRADING AS CARMICHAEL^{UK}

**MODERN SLAVERY ACT 2015 STATEMENT
MARCH 2022**

Introduction

Carmichael Site Services Limited is a company operating in the civil engineering industry, acting as an agency and an employment business. The company trades under the name Carmichael^{UK}. The primary purpose of Carmichael^{UK} is to support construction and civil engineering projects by providing skilled and competent workers to our partner clients.

Carmichael^{UK} is committed to **placing people first** and aims to treat all people with dignity and respect. The company has a zero-tolerance approach and in meeting its obligations to prevent slavery and human trafficking and works collaboratively to prevent it within both its business and within its supply chains.

The company approach to modern slavery is to 'find and fix' and our board provide purposeful leadership working together with our company-wide Modern Slavery Ambassadors. The company's strategy in addressing modern slavery ensures that people are always at the heart of our organisation. This is achieved by working in close partnership with training providers, industry experts, clients, candidates, and suppliers to raise awareness, promote vigilance and recommend best practice around ethical employment. Transparency of our processes and procedures helps the company to identify the situations or circumstances where there may be a potential for being targeted by traffickers and unlicensed gang-masters. These areas are made a focus. For Carmichael^{UK} these focus areas are recruitment of workers, PPE suppliers, and cleaning companies.

All employees have access to channels where they can raise concerns, either through local reporting mechanisms or through the global whistleblowing procedure. Carmichael^{UK} is fully committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

The Carmichael^{UK} Modern Slavery policy and the Carmichael^{UK} Whistleblowing policy are designed to guide best practice and are available from our HR department upon request.

Management of the risk of modern slavery and human trafficking

Carmichael^{UK} has robust operational process and procedures within our recruitment, compliance, and payroll operations to combat the risk of modern slavery. These include:-

- Thorough right to work checks using government certified software
- Thorough reference and qualification checks before employment is offered
- Monitoring of fatigue management to identify potential modern slavery risk
- Two step bank account verifications via our bankers and our compliance department
- Access to whistleblowing processes to enable concerns to be raised
- Checks on our suppliers to ensure compliance with the best practice outlined in our policies

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Additionally, the company has taken the following steps to manage the risk of modern slavery and human trafficking within its operations and its supply chain:-

- Provided appropriate training to all members of staff about the signs of modern slavery
- Carried out assessments to establish where the company is most at risk of modern slavery
- Put extra training in place in areas where we feel the company could potentially be targeted
- Engaged with the Supply Chain Sustainability School to assist in identifying best practice
- Requested to join the Gangmasters and Labour Abuse Authority (GLAA)
- Appointed Modern Slavery Ambassadors in each of our Operational Departments
- Worked collaboratively with clients in our own upstream supply chain to combat the risks
- Downloaded the Unseen app to all company mobile phones

Next steps

For the year ending March 2023, Carmichael^{UK} will be focusing on the matters outlined below:-

- Including reference to modern slavery in all induction materials for employees
- Including reference to modern slavery in induction materials for workers
- Completing registration for The Construction Protocol through the GLAA
- Sending the Unseen app and associated information to the current workforce
- Continuing our campaign of raising awareness over our social media platforms
- Continuing with training of our office-based employees to recognise the signs
- Carrying out toolbox talks on the subject for our onsite workforce
- Raising awareness of our Whistleblowing procedures for office and site-based employees

Carmichael^{UK} regularly reviews its policies and procedures, at least annually, to ensure employees have access to any additional information and support they may require to collectively assist in managing the risk of human trafficking, forced labour, servitude, and slavery.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Carmichael^{UK} in respect of the financial year ending March 2022.

This statement was approved by the board of Carmichael^{UK} on 16th March 2022.

Signed for and on behalf of Carmichael Site Services Limited trading as Carmichael^{UK}



Rod Carmichael
Managing Director, Carmichael^{UK}

