

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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### Policy Statement

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The term slavery is often associated with the 18th and 19th centuries; however the practice still continues today in one form or another in every country in the world and is becoming significantly more prevalent in the UK.

The Modern Slavery Act 2015 consolidates slavery and trafficking offenses and introduces tougher penalties and sentencing rules. It ensures that the police and law enforcement agencies have the powers they need to pursue, disrupt and bring to justice those engaged in human trafficking and slavery, servitude and forced or compulsory labour. It also introduces measures to enhance the protection of victims of slavery and trafficking.

Carmichael<sup>UK</sup> provides a permanent, executive, interim, contract and temporary recruitment service within the civil, construction, rail and highways market in the UK.

We oppose all forms of slavery and trafficking and are fully committed to compliance with the Modern Slavery Act 2015.

We have therefore created the following procedure to ensure that all staff, suppliers, business partners, consultants, contractors and temporary workers understand what modern slavery is, how to recognise the common signs of it and how to report it.

### Scope of the Policy

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It is the duty of all employees, suppliers, business partners, consultants, contractors and temporary workers to comply with this policy. All employees are made fully aware of the group policies and their duties and responsibilities under them. Suppliers, business partners and consultants are made aware of the policy as part of their contract with us.

This policy is freely available on our website via a statement of our approach to Modern Slavery and adherence to the legislation.

### Responsibilities

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It is the direct responsibility of the Managing Director to ensure the implementation of this policy on a day-to-day basis; however, all employees have a responsibility to accept their personal involvement in applying it and must be familiar with the policy and ensure that it is followed by themselves, employees, contractors and temporary workers for whom they have a responsibility.

This policy will form part of Carmichael<sup>UK</sup>'s induction training.

Disciplinary action may be taken against any employee 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 Company's 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.

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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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.

Suppliers, business partners and consultants risk termination of their contract with Carmichael<sup>UK</sup> if found to be in breach.

### What is Modern Slavery?

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There are many different characteristics that distinguish slavery from other human rights violations, however only one of these needs to be present for slavery to exist. Someone is in slavery if they are:

- Forced to work - through mental or physical threat.
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse.
- Dehumanised, treated as a commodity or bought and sold as 'property'.
- Physically constrained or has restrictions placed on his/her freedom of movement.

Modern Slavery takes various forms and affects people of all ages, genders and races. Common forms of Modern Slavery include:

- **Forced labour** - any work or service which people are forced to do against their will under threat of some form of punishment. Almost all slavery practices contain some element of forced labour. It is frequently found in labour intensive and/or under-regulated industries such as agriculture & fishing, domestic work, construction, mining, quarrying, manufacturing, processing, packaging, prostitution & sexual exploitation, market trading and illegal activities.
- **Bonded labour** - a person becomes a bonded labourer when their labour is demanded as a means of repayment for a loan. The person is then tricked or trapped into working for very little or no pay and debts are often passed from generation to generation
- **Human trafficking** - involves people including children being brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will. People can be trafficked for many different forms of exploitation including forced prostitution, forced labour, forced begging, forced criminality, domestic servitude, forced marriage and even forced organ removal. When children are trafficked, no violence, deception or coercion needs to be involved: simply bringing them into exploitative conditions constitutes trafficking.
- **Descent-based slavery** - a situation where people are born into a 'slave class', caste or a group viewed as being in slavery by other members of their society. If one's mother is in slavery, one is born into slavery.
- **Child slavery** - includes children who are used by others who profit from them including prostitution or pornography, forced begging and petty theft, the drug trade, forced labour (including domestic work) and forced participation in armed conflict.
- **Slavery in supply chains** - many of the products we buy and use every day were made using forced labour at some point in production. This is not just about a company's suppliers, but the suppliers of suppliers right back to the raw material.
- **Forced and early marriage** - covers children under the age of 18 and can be referred to as slavery if one or more of the following elements are present:
  - If the child has not genuinely given their free and informed consent to enter the marriage.
  - If the child is subjected to control and a sense of "ownership" in the marriage itself, particularly through abuse and threats, and is exploited by being forced to undertake domestic chores within the marital home or labour outside it, and/or engage in non-consensual sexual relations.
  - If the child cannot realistically leave or end the marriage, leading potentially to a lifetime of slavery.



## Common Signs of Modern Slavery

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Modern Slavery is a hidden crime because it can be difficult to identify a victim. Common signs include:

### Physical appearance where the person:

- Is tearful, anxious, depressed, submissive, tense, or nervous/paranoid.
- Exhibits unusually fearful or anxious behaviour.
- Appears withdrawn.
- Avoids eye contact.
- Is reluctant to seek help.
- Lacks health care/dental care.
- Appears malnourished.
- Shows signs of physical and/or sexual abuse, physical restraint, confinement, or torture.

### Isolation where the person:

- Is not allowed to travel on their own.
- Rarely interacts with others.
- Is unfamiliar with their neighbourhood or where they work.
- Seems under the control of others.

### Lack of control where the person:

- Has few or no personal possessions.
- Is not in control of his/her own money, no financial records, or bank account.
- Is not in control of his/her own identification documents (ID or passport).
- Is not allowed or able to speak for themselves (a third party may insist on being present and/or translating).
- May wear the same clothes day in day out or clothes that are inappropriate for the work being done.

### Poor living conditions which are:

- Dirty cramped environment.
- Over-crowded accommodation.
- Involve living and working at the same place.

### Unusual travel times where the person:

- Maybe dropped off and collected for work on a regular basis either very early or late at night.

## Actions to Reduce the Risk of Modern Slavery

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Carmichael<sup>UK</sup> will:

- Ensure all employees, are aware of what constitutes modern slavery and the common indicators to enable them to identify victims more easily.
- Ensure that suppliers, customers, business partners and others who are directly linked to our business operations understand that we have a zero-tolerance approach to modern slavery.
- Walk away from business or contracts that we suspect may expose us to organisations that condone or use modern slavery practices either directly or indirectly.
- Conduct due diligence with formal suppliers with an annual in excess of £30,000 (excluding VAT) with the aim of ensuring that the company does not purchase products where slavery or human

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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trafficking may form part of the production process. This includes avoiding complex supply chains where such risks are increased.

- Include clauses relating to modern slavery and human trafficking in contracts with formal suppliers and require them to confirm that they will comply with the company's Purchasing & Procurement Policy.
- Examine the company's direct operations, supply chain and other business relationships in high risk environments to identify risk factors.
- Review performance of key suppliers in terms of policies and practices regarding labour rights issues as part of the procurement process for key purchases.
- Document any identified instances of modern slavery in the business or supply chain together with details of corrective action plans and results.
- Avoid making demands of suppliers or subcontractors that may lead them to abuse human rights and ensure agreed payment terms are adhered to.
- Put in place procedures for reporting concerns over modern slavery within the company's operations, and communicate these effectively including a Whistleblowing Policy and clear grievance procedure.
- Follow up any reports or suspicions relating to modern slavery or human trafficking.
- Ensure compliance with associated company policies including its:
  - Purchasing & Procurement Policy.
  - Ethics & Business Integrity Policy.
  - Whistleblowing Policy.
- Provide a copy of this Modern Slavery & Human Trafficking Policy to anyone who makes a written request for it within 30 days from receipt of the request.
- Comply fully with the ETI Base Code including the April 2014 Amendment as detailed below.

## The ETI Base Code

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Carmichael<sup>UK</sup> complies fully with the ETI Base Code:

- 1 Employment is freely chosen. There is no forced, bonded or involuntary prison labour and workers are not required to lodge "deposits" of their ID papers with us or our clients and are free to leave after reasonable notice.
- 2 No employee will be prevented from joining or forming a staff association or trade union, nor will any employee suffer any detriment as a result of joining, or failing to join, any such organisation. Representatives will not be discriminated against and will have access to carry out their functions in the workplace.
- 3 Working conditions are safe and hygienic and adequate provisions are taken to prevent accidents and injuries to health by minimising hazards in the workplace. In line with our Health & Safety Policy, all employees will receive health & safety induction training.
- 4 Child labour will not be used and Carmichael<sup>UK</sup> will not knowingly engage with organisations that use child labour.
- 5 As a minimum we pay the living wage to all employees and they will receive a written contract detailing their employment conditions. Employees will be made aware of the terms and conditions of their employment or engagement from the outset. In particular employees must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Employees must also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum. Deductions from wages as a disciplinary measure is prohibited and all disciplinary action will be recorded.
- 6 Working hours will not be excessive and contracted hours shall not exceed 48 hours per week unless the employee has opted out of the working time regulations. Overtime is voluntary and the total hours worked in a week shall not exceed 60 unless exceptional circumstances apply.

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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- 7 In line with our Equality, Diversity & Inclusion Policy, we do not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on any protected characteristic as identified in the Equality Act 2010. All employees must be treated equally. Employees with the same experience and qualifications should receive equal pay for equal work.
- 8 To every extent possible regular employment will be provided.
- 9 No harsh or inhumane treatment is allowed including physical abuse or discipline, sexual abuse or the threat of such abuse or intimidation.

## Supply Chain

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We 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 regard to legal and contractual compliance.

## Reporting of Suspected, Alleged or Confirmed Cases of Modern Slavery & Human Trafficking

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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 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 call for more 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.

## Review

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This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.

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## MODERN SLAVERY & HUMAN TRAFFICKING TRANSPARENCY STATEMENT

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### Background

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Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery.

Carmichael Site Services Ltd Ta Carmichael<sup>UK</sup> (CUK) recognises its obligations to prevent slavery and human trafficking and will work with both candidates and clients alike to prevent slavery and human trafficking within both its business and supply chains.

As a provider of contingent labour to the Civil Engineering, Construction, Rail and Highways sectors, we take our responsibilities extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed gang-masters.

We work within an ISO 9001 quality framework and regularly review our processes around candidate engagement to ensure all employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified.

This statement focuses specifically on CUK's compliance with the Modern Slavery Act 2015 (the Act) and highlights some of the steps taken to mitigate the risks of slavery or human trafficking occurring within the company or its supply chains.

We understand that our clients and candidates value our transparency and that we try to ensure that our service delivery is completed with fairness and integrity. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

### Organisational Structure

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CUK is a privately owned limited company. For over twenty years we have delivered our services nationally to a number of the UK and Ireland's leading companies.

### Our Supply Chains

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Our supply chains support the activity of sourcing candidates for clients.

Our suppliers, both old and new, are expected to operate to the highest ethical standards, to remain fully compliant and adhere to all legislative and statutory requirements. We also expect our suppliers to promote similar standards in their own supply chain.

### Our Policy on Modern Slavery and Human Trafficking

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CUK staff and suppliers are expected to adhere to our Modern Slavery & Human Trafficking Policy. In the case of our suppliers, the following guidelines should be applied:

- Employees should be free to choose to work for their employer and to leave the company upon reasonable notice.
- All employees must be provided with a clear contract of employment, which complies with local legislation.

## MODERN SLAVERY & HUMAN TRAFFICKING POLICY

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- All employees must be treated in a fair and equal manner and with dignity and respect.
- Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, nationality, ethnic or national origin), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background should be prohibited.
- All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions. Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.
- All slavery and human trafficking laws must be complied with including, but not limited to, the Modern Slavery Act 2015. Suppliers must ensure their business operations are free from slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships.

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.

## Due Diligence Process for Slavery and Human Trafficking

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As part of our commitment to identify and eradicate slavery and human trafficking, we have in place a process to undertake due diligence on our key suppliers.

CUK ensures strict compliance checks are carried for all candidates it supplies. This includes verification of each candidate's Right to Work.

All CUK employees have access to services where they can raise concerns, either through local reporting mechanisms or through the global whistleblowing procedure. CUK 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.

## Training

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All staff within CUK are expected to comply with all laws and act in accordance with guidelines and regulations and act with honesty, integrity, professionalism and proactivity.

We regularly review our policies and procedures, at least annually, to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, servitude and slavery.

In addition we invest in training for our staff, using various delivery channels, to increase awareness and understanding with regard to modern slavery.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes CUK's slavery and human trafficking statement in respect of its 2019/20 financial year.

### Signed:

**Name:** Rod Carmichael  
**Designation:** Managing Director  
Carmichael<sup>UK</sup>

### Date: