

MODERN SLAVERY STATEMENT YEAR ENDING 2026



Introduction

Carmichael Site Services Limited, trading as Carmichael^{UK}, have developed this Modern Slavery Statement in partnership with its retained specialist consultants. Our consultants are a company consisting of leading national modern slavery experts, including frontline modern slavery responders, and lived-experience consultants. This means that our operations, practice, and policies for modern slavery have been co-produced with a team of modern slavery experts and people who have lived experience of modern slavery and human trafficking.

By taking this approach, we recognise the importance of meaningful inclusion of lived experience. By embedding lived experience, we have taken a significant step towards more informed, accountable, and impactful practice. This combination of both lived and learned expertise provides a unique and rare comprehensive level of insight which can detect hidden nuance, systemic gaps, and the immediacy of any potential harmful risk.

We are aware that people with lived experience bring additional knowledge that cannot be gained by any other means. They bring additional insight and understanding as to how systems work in practice, they understand barriers, power dynamics, and unintended consequences. They also frequently recognise patterns that professionals may overlook because they have experienced or witnessed them repeatedly. Lived experience can also provide understanding of social environments, communities, and subcultures that institutions struggle to access. This knowledge helps make policies and strategies more realistic and effective.



Therefore, this approach and this Modern Slavery Statement outline our zero-tolerance approach to modern slavery and human trafficking. This statement applies to all employees, contractors, suppliers, and business partners and is published in line with the requirements of Section 54 of the UK Modern Slavery Act (2015).



About Carmichael^{UK}

Carmichael^{UK} was founded in 1995 by Collette and Rodney Carmichael and has continued successfully trading for over thirty years working in partnership with tier one clients within the construction industry. Rodney Carmichael is a civil engineer with over twenty years of experience of working on site. Our business provides professional, technical, trades and labour personnel on a contract and permanent basis to the civil engineering and construction industry. We support our clients by offering innovative solutions using our expert knowledge of the construction industry. Our clients and partners span across different sectors within the United Kingdom, Ireland and Australia.

Our mission is to be the agency of **choice** for both candidates and clients and to offer honest and impartial advice based on our complete understanding of the construction industry. We are committed to fostering a culture of integrity, transparency, fairness, and respect within our business and throughout our entire supply chain.

Carmichael^{UK} has gained a reputation for always **'Placing People First'**



Scope

This statement inclusively applies to all employees, contractors, suppliers, and business partners and any persons engaged with Carmichael^{UK}.

Our Commitment to combating modern slavery and human trafficking

Carmichael^{UK} has adopted the definition of modern slavery and human trafficking as defined by section 54 of the Modern Slavery Act 2015 and is applicable to any conduct which would constitute an offence in any part of the United Kingdom under any of the provisions if the conduct took place in that part of the United Kingdom, and applied to England, Wales, Scotland and Northern Ireland.

We are committed to combating modern slavery in all its forms, which includes forced labour, child labour, or prison labour, and we do not tolerate any acts or methods to gain control over another for the purpose of exploitation. We will take immediate action should we identify any indication of:

- Abuse of vulnerability
- Abuse of power
- Deception or coercion
- Restriction of movement
- Intimidating or threatening behaviour
- Physical or sexual violence
- Withholding wages, agency fees, documents, or passports

Or any other indicator of forced labour or exploitation as laid out by the Forced Labour Convention, 1930 (No. 29); Protocol of 2014 to the Forced Labour Convention (P029); and, Abolition of Forced Labour Convention, 1957 (No. 105).

We are also committed to ensuring that our business conduct complies with applicable laws, operates with responsibility, honesty and integrity, and that we treat people with dignity and respect. We recognise our responsibility to uphold fundamental human rights, which include those in the UN Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and to ensure that modern slavery and human trafficking have no place in our operations or supply chain.

We comply with all UK employment laws and expect all employees, contractors, suppliers, and business partners to comply with these, as well as our company policies.

Our Principles

- We are committed to being transparent and trustworthy.
- We aim to do what is right, not what is easy, and to lead the way in providing a responsible, ethical, and accountable service.
- We respect people and treat them as individuals and treat others as we wish to be treated ourselves.
- We are committed to fostering a culture of integrity, transparency, fairness, and respect within our business and throughout our supply chain.
- We respect and recognise that everyone has equal rights, and we aim to support and address inequity for anyone who is socially, financially, or politically disadvantaged, which includes all underrepresented groups, including racial, sexual, gender identities, physical and mental disabilities.



Modern Slavery Policy

In 2025, our Policy was reviewed by our retained Senior Policy expert with lived experience. This included working with focus groups with site-based and office-based staff, attending site visits, presenting to workers, and speaking with on-site staff. This helped us identify areas for improvement with realistic actions, all through the lens of lived experience, providing trauma-informed insights.

Our Modern Slavery policy will be further developed in 2026. The policy applies to all employees, suppliers, business partners, consultants, contractors, and temporary workers who work for or with Carmichael^{UK}. All employees are made fully aware of this policy and their duties and responsibilities under it at their induction. The policy and our approach to combatting modern slavery is communicated to new starters by one of our Directors during the first few weeks of employment. Our modern slavery safeguarding team are responsible for sharing their knowledge on a day to day basis to reinforce the importance of continuing to be vigilant to this risk. All suppliers, business partners and consultants are made aware of the policy as part of their contract with us and we routinely check their approach in complying with this policy. As a company we 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 the steps we are taking to manage the risk relating to modern slavery and human trafficking.

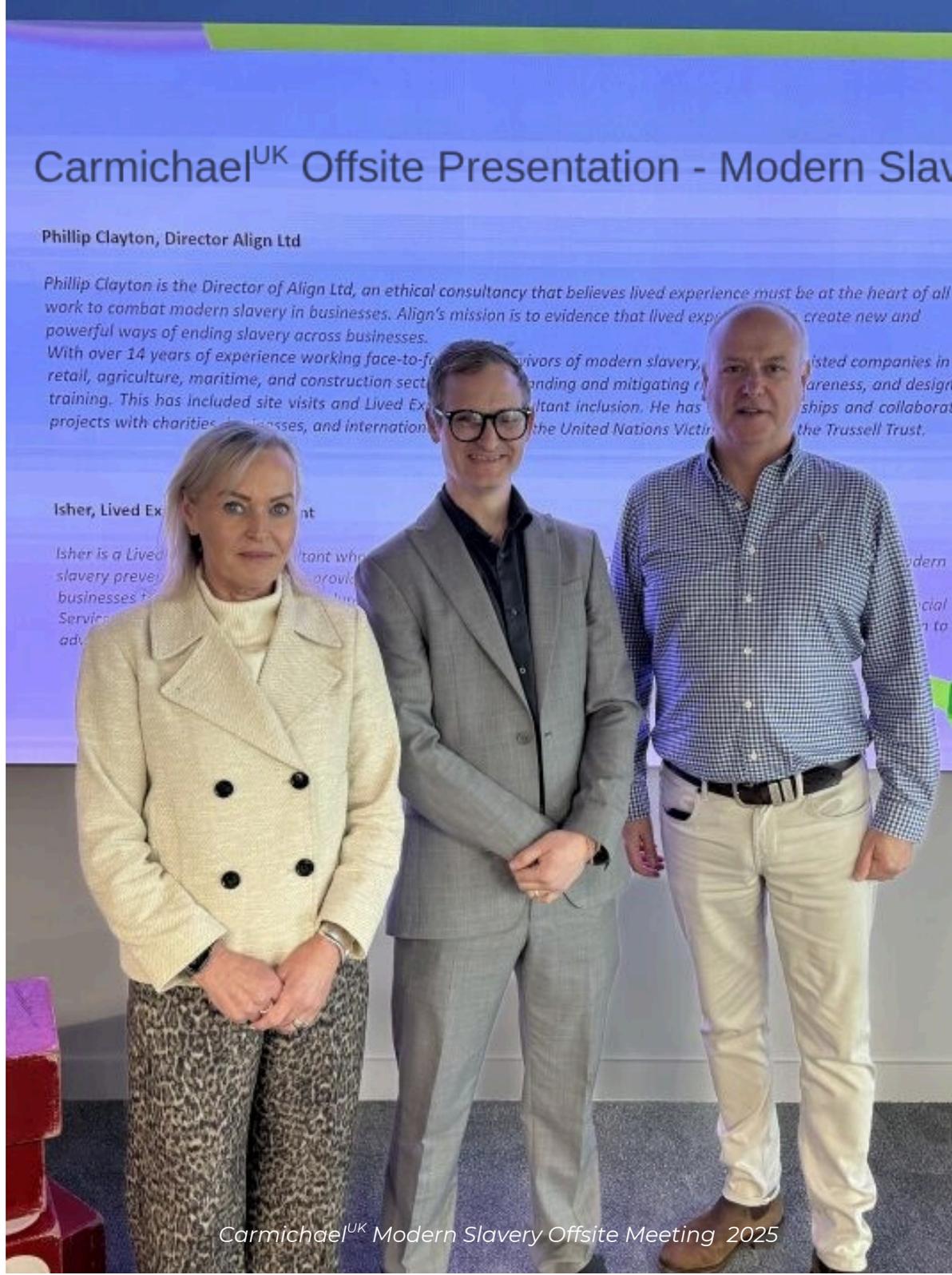


Due Diligence

We conduct thorough due diligence assessments of our employees, contractors, suppliers, and business partners to identify and mitigate any potential risks of modern slavery within our supply chain. This includes assessing their policies, practices, and adherence to relevant legislation.

During the course of the year we changed our PPE supplier as they did not meet our required standards. We continue to monitor our supply chain for adherence to the standards that we expect.

We undertake welfare checks and HR and payroll checks, conduct audits, and, through our dedicated Modern Slavery Response Service, we are able to track Early Risk Indicators and our responses to them.



CarmichaelUK Modern Slavery Offsite Meeting 2025

Training & Awareness

All our employees and key stakeholders are required to complete compulsory modern slavery training via online modules which result in increased awareness alongside certification of completion of the various courses. In addition, in 2025, working with our retained consultants, we

have run several workshops with our Safeguarding Sentinels, a dedicated staff team upskilled in identifying and responding to Early Risk Indicators of Modern Slavery across sites and administrative operations.

We have developed a new Lived Experience training session delivered in person on construction sites, tailored for managers and supervisors, to increase their confidence in identifying and taking action on indicators of Modern Slavery. Our pilot delivery at the largest UK construction site, showed a high level of impact among attendees. This first-of-its-kind Modern Slavery Workshop was attended by Supervisors and Senior Site Personnel from two of the main contractors on the project.



The session opened with Lived Experience consultants setting a powerful tone for the workshop. Participants then worked through real site-based modern slavery scenarios in group sessions, sparking meaningful discussion and reflection. The teams explored how to spot early indicators and take appropriate action.

Participants highlighted the inclusion of Lived Experience voices as the most impactful part of the day, noting that the training will help them better recognise risk indicators and understand what to look for on site.



Reporting

In 2025, we acknowledged the need for specialist support when identifying and responding to modern slavery indicators. We engaged experienced consultants to provide us with a Modern Slavery Response Mechanism to support us in this aim.

The response mechanism has been a valuable service, being contacted a total of six times in the last two quarters of 2025, capturing multiple early risk indicators, such as:

- Low level of spoken and written English
- People speaking on behalf of others
- Duplicate addresses
- Fake solicitor details given
- Inconsistencies in information from candidates living at the same address
- Poor physical appearance
- No PPE
- Fearful of others

Reports were received from multiple departments and staff members, including trades and labour departments, Payroll, the Office team, the Site team, Recruitment, and Directors.

One case that was referred to the Response Mechanism prompted our retained consultants to engage appropriate internal and external stakeholders to conduct an investigation, resulting in sanctions and the identification of three potential victims. We continue in 2026 to engage this crucial Modern Slavery Response Service.

In addition, our staff and supply chain can report in accordance with our whistleblowing policy.

Continuous Improvement

In 2026, we will continue to develop key areas of our approach to modern slavery. The table below shows our activities in 2025 and our action plan for 2026.

| In 2025, we did: | In 2026, we will do: |
|--|---|
| Modern Slavery Lived Experience Awareness session during the annual staff away day. | Lived Experience enhanced Modern Slavery Statement and Policy. |
| Senior Lived Experience Policy Advisor reviewed our Modern Slavery Policy and Statement. | Set new key performance indicators for the safeguarding team to drive early identification of potential risk Indicators |
| Lived Experience toolbox talk delivered to the entire workforce on one of our client's sites. | Develop a training presentation for Safeguarding team with content for all and tailored content for site and office staff, including response service, ERI quick guide, and KPI's. Training and train- the-trainer session. |
| Initiated Response and Remediation Service. | Continue Response and Remediation Service. |
| Developed and piloted on site an enhanced Exploitation Awareness and Response Training course led by Lived Experience. | Exploitation Awareness and Response Training at more sites across the UK |
| Safeguarding Sentinel Quarterly meetings for accountability of the above delivery. | Continue Safeguarding Sentinel Quarterly meetings for accountability of the above delivery. |



Carmichael^{UK} Safeguarding Team explaining their duties to the wider company at offsite meeting

Governance

We have a designated Safeguarding Team whose role is to oversee our policies and operations regarding modern slavery under the supervision of a Board Director. The Director responsible for combatting modern slavery is Collette Carmichael. She can be contacted at 0208 522 8888 or hr@carmichaeluk.com. In case of emergency, any member of our team can be contacted.

We expect all employees, contractors, suppliers, and business partners to adhere to the principles outlined in this statement and to actively support our efforts to combat modern slavery.

This statement is approved by the Board of Directors and will be updated annually to ensure its ongoing effectiveness and relevance.

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

Rod Carmichael

**Rodney J T Carmichael
Director & Chief Executive**



Onsite Modern Slavery Presentation

