



## **CARMICHAEL SITE SERVICES LIMITED TRADING AS CARMICHAEL<sup>UK</sup>**

### **MODERN SLAVERY ACT 2015 STATEMENT MARCH 2025**

#### **Introduction**

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

Carmichael<sup>UK</sup> is committed to **placing people first** and aims to treat all people with dignity and respect. This is achieved through our core values of honesty, integrity, professionalism, and proactivity. Carmichael<sup>UK</sup> is committed to working within its own business and supply chains, and across the construction industry to actively confront the challenge presented by the risk of labour exploitation in all of its forms.

This statement sets out the steps we are taking collectively as a business to identify, mitigate, and eliminate the risks of modern slavery and human trafficking in our business and supply chain, in compliance with the Modern Slavery Act 2015.

#### **Organisation structure and supply Chains**

The structure of the organisation is split across head office staff, directly employed site workers, and agency site workers. Our workers are engaged under various contracts, including umbrella companies, depending on the role that they are required to carry out. We carry out stringent audits across our own workforce as well as the companies that we contract with and to.

Our company has been an Achilles certified Ethical Employer since November 2022 and is audited annually for its adherence to appropriate processes and procedures. The Board of Directors is committed to preventing slavery and human trafficking by ensuring that: -

- our company policies around ethical employment are clear, monitored, and enforced
- our processes are rigorous and capable of preventing modern slavery
- our staff and workforce are educated about the potential risk areas in our organisation
- our staff and workforce are educated and aware of the risks in our industry
- our staff and workforce feel confident in how to raise a suspicion of modern slavery
- our modern slavery ambassadors lead a focused campaign to raise awareness of the issues
- our workforce can access Key Information Documentation detailing their pay arrangements
- the risk of modern slavery is included on the board's heat risk map and reviewed monthly

## **Policies & Governance**

We have a group of company policies that are intended to ensure that all people are treated fairly in our business and our supply chain. We are committed to doing things right for the people who work with our company and in our industry. We do this by ensuring that the real risk of modern slavery and human trafficking is mitigated, identified, responded to, and remedied through our policies and procedures. Our policies in connection with managing the risk of modern slavery are continually reviewed and developed. These are listed below and are available on our website.

- Anti-bribery and Anti-corruption Policy
- Collaborative Working Policy
- Corporate Social Responsibility & Ethical Conduct Policy
- Ethics & Business Integrity Policy
- Equality, Diversity & Inclusion Policy
- Fatigue Management Policy
- Fraud Policy
- Modern Slavery & Human Trafficking Policy
- Whistleblowing Policy

The company operates a Risk Register which records any concern raised relating to suspicion of modern slavery. The Risk Register is escalated to the Board within 4 hours of a potential incident and is reviewed regularly at Governance meetings.

## **Assessment and management of risk of modern slavery and human trafficking**

The largest operational risk of modern slavery within our company exists in the onboarding of new employees and agency workers. This risk is mitigated through our operational policies and procedures and through constant education of our staff. Our second largest operational risk is through the purchase of PPE, IT equipment and office consumables. This risk is mitigated through our supplier evaluations and through constant education of our staff.

Accordingly, Carmichael<sup>UK</sup> continues to operate robust operational processes and procedures within our recruitment, compliance, and payroll operations to manage the risk of modern slavery within our own organisation and within our supply chain. These include the following compliance checks when recruiting and onboarding agency and employed labour: -

- 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

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

## **Training about awareness and prevention of Modern Slavery and human trafficking**

For the year ending 2025, we have been focusing on working with the construction industry to raise awareness of the issue and to highlight the mitigations that can be put in place to stop modern slavery. Our director delivered a keynote speech at the Supply Chain Sustainability School Conference in October 2024 outlining the protocols that are in place at Carmichael<sup>UK</sup>. The company participated in the procurement of the Modern Slavery video in conjunction with LOR, Skanska, Morgan Sindall, and Berkeley Group.

At the company's biannual offsite meeting in March 2025, we engaged Align Ltd to deliver a workshop for our staff. Align Ltd is an ethical consultancy that accelerates the inclusion of experts with lived experience of modern slavery in businesses, driving new prevention innovations.

We continue to deliver modern slavery information to our entire workforce through face-to-face toolbox talks and sharing information on the subject with our client's workforce. Our labour managers regularly visit our on-site employees and are vigilant for signs of modern slavery.

We believe that raising awareness is key in tackling this issue, coupled with stringent adherence to the code of conduct that we follow as an ethical employer.

## **Review of Policy and procedure**

Carmichael<sup>UK</sup> 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<sup>UK</sup> in respect of the financial year ending 31<sup>st</sup> March 2025.

This statement was approved by the board of Carmichael<sup>UK</sup> on 25<sup>th</sup> March 2025.

Signed for and on behalf of Carmichael Site Services Limited trading as Carmichael<sup>UK</sup>



Collette Carmichael  
Director  
Carmichael<sup>UK</sup>