

CPC Civils - MODERN SLAVERY STATEMENT

INTRODUCTION FROM THE BOARD OF DIRECTORS

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We are proud of the steps we have taken to combat slavery and human trafficking.

ORGANISATION'S STRUCTURE

We are a national civils engineering contractor which provides experienced personnel; from site labour, engineering and management to client projects and offers offsite project management of client projects. We are specialists in Waterways and Water Infrastructure, District Heating and Civil Engineering.

We have over 125 employees and operate throughout the United Kingdom on various engineering and construction projects.

We have an annual turnover of £37.2 million.

OUR BUSINESS

Our business is organised into 3 business units: Water Engineering, District Heating and Civil Engineering.

OUR SUPPLY CHAINS

Our supply chains include works on the following frameworks:

Environment Agency, Severn Trent Water, Anglian Water, Yorkshire Water, Affinity Water, Scottish Water, Dee Valley Water, Canal & Rivers Trust, Highways England, Coastal & Marine, Viola, Energi, National Grid, Eon.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline OR contact our HR department.

- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Any other policies relevant to our business or sector** We may have other relevant policies to which they can refer, for example a corporate social responsibility policy.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we:

- Map the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluate the modern slavery and human trafficking risks of each new supplier;
- Review on a regular basis all aspects of the supply chain based on the supply chain mapping;

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking and expect all those in our supply chain and contractors comply with our values and ethics specifically in relation to modern slavery by undertaking a similar assessment of modern slavery within their respective business and supply chains.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

LIST KPIs :

SCREENING – the number and type of issues identified on screening suppliers and sub-contractors

WHISTBLOWING – the number of reported breaches in the past year.

TRAINING – the number or percentage of staff trained

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2018

Board approval

This statement was approved on 01/04/2021 by our board of directors, who review and update it annually.

CPC Civils LTD