

Policy Statement

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^{UK} 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

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.

Carmichael^{UK} has not yet reached the minimum annual turnover threshold of £36 million which requires us to communicate an annual slavery and human trafficking statement on our website and disclose what steps we have taken during the financial year to ensure our business and supply chain remains slavery free. The market is encouraging companies to communicate ahead of turnover we plan to exceed this year so are communicating now.

Responsibilities

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^{UK}'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.

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^{UK} if found to be in breach.

What is Modern Slavery?

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.

Contemporary 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

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

Carmichael^{UK} 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 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

Carmichael^{UK} 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^{UK} 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.
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

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

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

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