

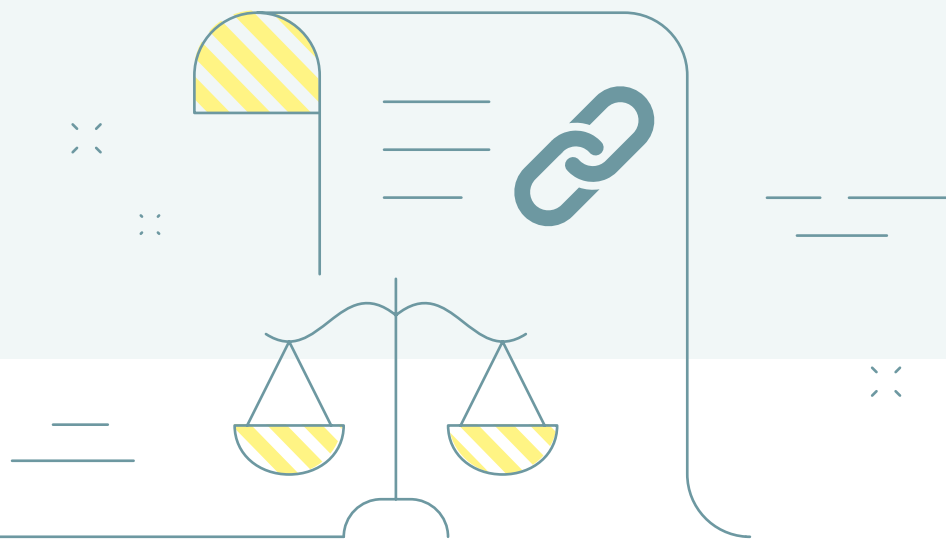


Human Resources

Modern Slavery Statement

2020/21

This statement has been published in accordance with section 54 UK Modern Slavery Act (2015). It sets out the steps taken by the Carey Group Ltd during the financial year from the 1st of October 2020 to the 30 September 2021 to prevent modern slavery in our business operations and supply chains.



Introduction

The Carey Group Ltd (which includes Carey Group Ltd and its direct subsidiaries, referred to in this Statement as “Carey Group Ltd”), wherever it operates, is committed to conducting business with honesty and integrity; in treating all people with dignity and respect and in complying with applicable

laws, regulations and treaties. The Carey Group Ltd is committed to protecting and promoting human rights throughout the UK and Ireland.



The Carey Group Ltd does not tolerate child labour, forced labour (including prison labour), or any use of force or other forms of coercion, fraud, deception, abuse of power or other means to achieve control over another person for exploitation.

We are committed to improving our practices to combat modern slavery and human trafficking.

Business Structure

Carey Group Ltd provide specialist construction services, including civil engineering, demolition, dry lining and house building together with RDF broker services. We have over 1000 employees and operate throughout the United Kingdom and Ireland, with a joint annual turnover in excess of £300million. Our Head Office is located in Wembley, North West London, and we have regional offices in Milton Keynes and Glasgow.

The organisation comprised of 7 business units during the reporting period:

P.J. Carey (Contractors) Ltd – working as both a subcontractor and on Design & Build contracts undertaking the construction of basements, substructures and superstructures, carrying out enabling and infrastructure works and hard and soft landscaping.

P.J. Carey (Contractors) Ltd Ireland – specialise in the delivery of civil engineering contracts throughout a range of sectors; Infrastructure and Renewable Energy, Residential (both Private and Public sector), Commercial, Retail and Industrial.

T.E Scudder Ltd – a specialist contractor delivering complex demolition, deconstruction and civils enabling works across a range of sectors. Note T.E. Scudder Ltd ceased trading in 2021.

BDL Group Ltd – specialising in commercial and residential dry wall systems, plastering, facades and rendering, and washroom fit out.

Carey New Homes Ltd – building quality homes across the South of England.

Seneca Environmental Solutions Ltd – a leading UK Refuse Derived Fuel manufacturer and exporter, providing a complete range of waste brokerage services to the Carey Group and local market.

P.J. Carey Plant Hire (Oval) Ltd – provides plant and vehicle hire to the Carey Group, supply chain plant hire, servicing, site repairs, formwork supply and HGV deliveries.

To find out more about the nature of our business, please visit our website at careys.co and bdl.co

Our Supply Chains

Our supply chains include the following:

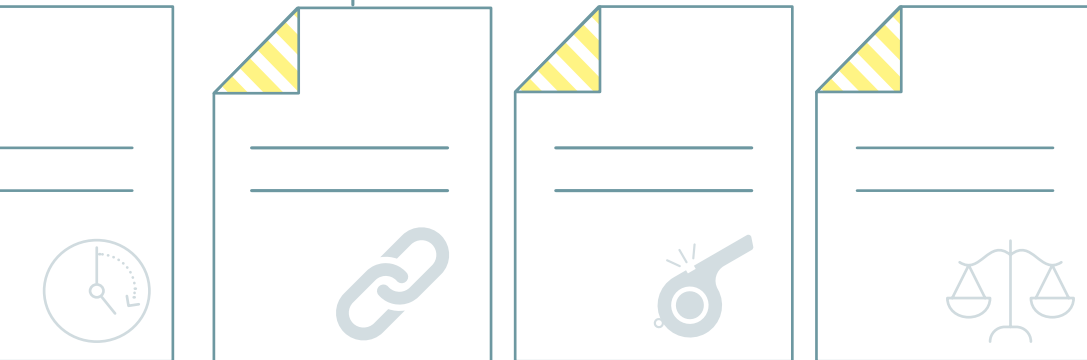
- Subcontractors;
- Recruitment/labour agencies;
- Suppliers of goods, services and materials.

Related Policies

We have in place several policies which contribute to our aim of combatting modern slavery and human trafficking, all of which are available to employees via our Company Intranet:

- > **Whistleblowing;** encourages reporting of any concerns relating to our direct activities or supply chains and ensures ease of making disclosures without fear of retaliation.
- > **Doing the Right thing Booklet;** sets out the standard of ethical business conduct we expect and applies to everyone who works for or represents the Carey Group Ltd.

- > **Anti-Bribery and Corruption;** demonstrates our commitment to preventing and prohibiting bribery and corruption in all areas of the organisation, including our supply chain.
- > **HSSQ Policy;** reiterates our ethical code of conduct in relation to suppliers and outlines our commitment to operating in a socially and environmentally responsible way ensuring a safe system of work and the highest quality.
- > **Equal Opportunities;** sets out our approach to equal opportunities and the avoidance of discrimination in all our working practices.
- > **Working Time Guidelines;** ensures our workers are not subjected to excessive working hours, overtime/night shift working is optional and encourages work/life balance.



Due Diligence Processes

We have in place systems to:

- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- We are an active member of Constructionline and only utilise suppliers of services who are members. This ensures we are using verified suppliers who meet recognised standards.
- All suppliers must have appropriate policies and standards in place before we engage with them and we will assess this via a supplier questionnaire.
- Where materials are sourced from high risk

countries, our supply chain is intentionally limited to suppliers well known to the organisation, who have demonstrated they meet our standards.

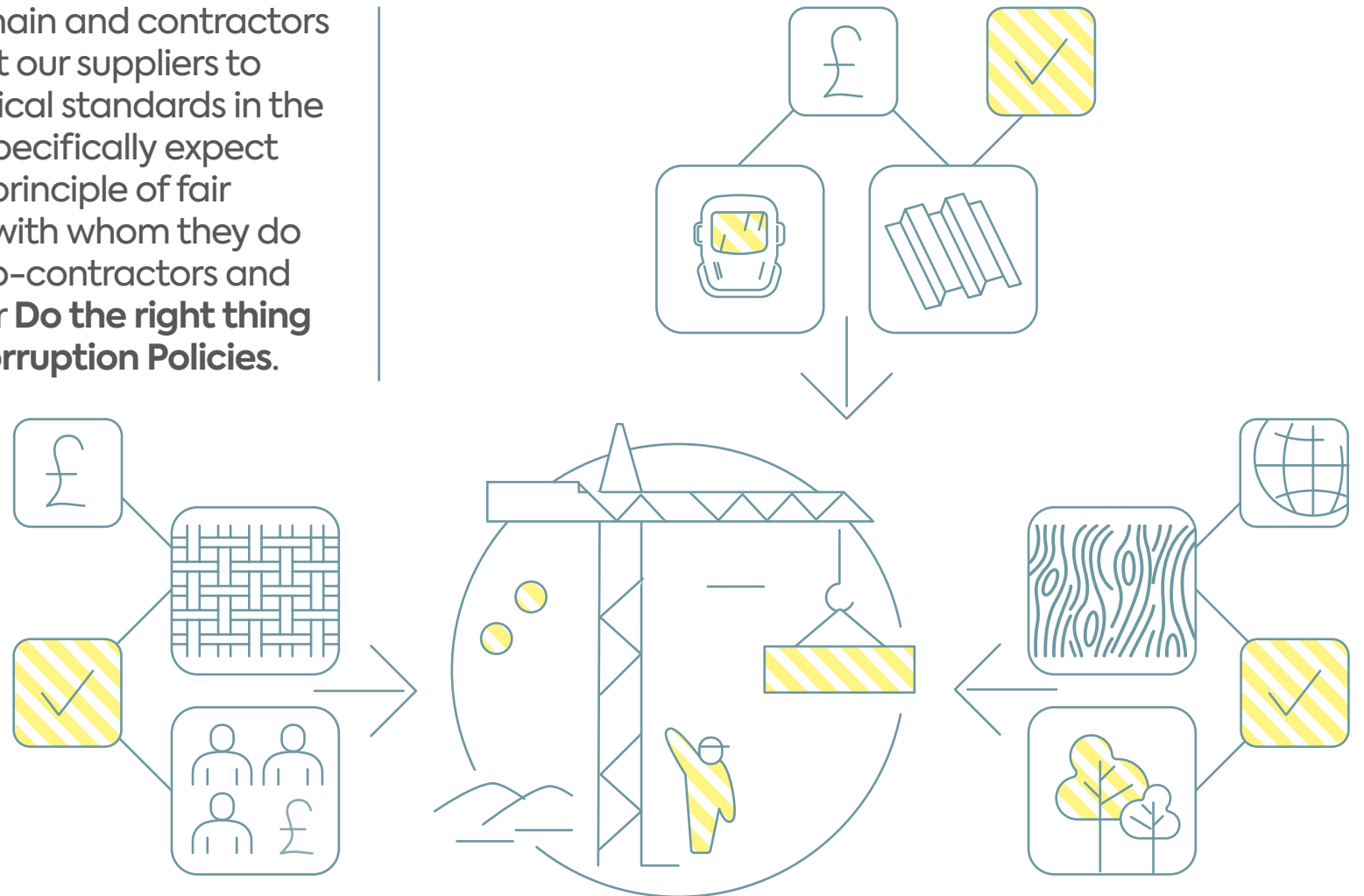
- Protect whistleblowers – our whistleblowing policy provides a mechanism for both those who work in and with the organisation to raise concerns.
- Share knowledge and improve understanding amongst our workforce. Through upskilling workshops and internal communications, we share signs to look out for and the mechanism for reporting suspected instances of modern slavery.
- A multidisciplinary Modern Slavery Huddle who meet on a weekly basis to address issues and progress our wider strategy in relation to modern slavery and ethical labour risk.
- We are a Part B supplier member of SEDEX, the Supplier Ethical Data Exchange which ensures we assess our risk and transparently share our data with registered clients and stakeholders.



Supplier Adherence to our Values and Ethics

To ensure all those in our supply chain and contractors comply with our values, we expect our suppliers to have a natural respect for our ethical standards in the context of their own culture. We specifically expect our suppliers to extend the same principle of fair and honest dealings to all others with whom they do business, including employees, sub-contractors and other third parties as set out in our **Do the right thing Booklet** and **Anti-Bribery and Corruption Policies**.

All of our suppliers of goods, services and materials must sign up to our Terms and Conditions of Order before we engage with them, which includes their agreement to the above statement.



Our Effectiveness

We use the following KPIs to measure how effective we have been at ensuring slavery and human trafficking is not taking place in any part of our business or supply chains:

Ensuring all employees involved directly with supply chains receive training on modern slavery awareness.



Undertaking a review of our Whistleblowing policy to include specific support and guidance relating to modern slavery and human trafficking.



Continuing to rigorously check right to work documentation. Fraudulent documents can be an indication of modern slavery, we provide upskilling workshops for our site teams and labour providers to ensure the risk of modern slavery is reduced.



Collaborate with our stakeholders to understand the supply chain risk through externally verified audit processes such as the Achilles Labour Practices Audit process.



Training

We are developing a tiered training programme to educate our workforce on the importance of tackling modern slavery and how to ensure prevention within our organisation or supply chains. This will be aimed at employees in our core Support Service functions who interact with our supply chains, as well as our Leadership team and Site Management.

The training will include (but is not limited to):

- > How to carry out effective due diligence when engaging with a new supplier
- > The signs to look out for that indicate someone may be a victim of modern slavery
- > How to report suspected instances of modern slavery, be that in our business or within our supply chain

We are also reviewing our on-site induction programme for all new workers to raise awareness of modern slavery, including key signs to look out for and the process for reporting it.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th September 2021. This statement is valid until the 31st March 2023.

This policy applies to all companies under the Carey Group Ltd. as specified below: -

- P.J. Carey (Contractors) Ltd
- P.J. Carey (Contractors) Ltd Ireland
- P.J. Carey Plant Hire (Oval) Ltd
- BDL Group Ltd
- T.E. Scudder Ltd
- Seneca Environmental Solutions Ltd
- Carey New Homes Ltd

Signed on behalf of Carey Group Ltd:

Signed: **Jason Carey**

Date: 31 March 2022

Mr. Jason Carey, Group CEO