



POLICIES & STATEMENTS

Modern Slavery Statement

January 2024

1 INTRODUCTION

- 1.1** This is the Modern Slavery and Human Trafficking Statement of Cardo Group and its subsidiary companies for the financial year ending 28th February 2025. It is published in accordance with section 54(1) of the Modern Slavery Act 2015 (the Act).
- 1.2** Whilst all of our business activities are UK based, we recognise that modern slavery and human trafficking are not issues that are restricted to projects overseas. Modern slavery and human trafficking exist in the UK, and supply chains extend globally.
- 1.3** The Cardo Group of companies is committed to taking appropriate and proportionate steps to ensure that no form of modern slavery or human trafficking is connected to our business and our supply chain. This zero-tolerance approach is outlined in our Modern Slavery Policy.
- 1.4** As part of our commitment, we regularly review and update our Modern Slavery Policy in line with current best practice.
- 1.5** We have shared the updated Modern Slavery Policy with all employees, reiterating our zero-tolerance approach to modern slavery and human trafficking.
- 1.6** Pre-qualification tools, through Constructionline, are embedded for the verification of our supply chain partners and contractors.
- 1.7** Our organisation is currently formed of full and part-time employees with a current headcount of over 600 employees. Our registered office is located in Cardiff, with operational sites across the home counties, south east, midlands and south west. A large proportion of our employees are site based, which means that

their location depends on the site on which they are working.

- 1.8** The Cardo Group of companies work with a number of subcontractors and consultants across a range of sectors and disciplines. Strong relationships with our subcontractors and consultants, as well as our customers, are fundamental to our way of working. In addition to subcontractors and consultants, the group has a network of supply chain partners for the direct sourcing of materials and services. This direct supply chain is entirely derived from merchants in the UK, but there are some limited, direct purchases from suppliers overseas.

2 POLICIES & PROCEDURES

- 2.1** We maintain, continuously review, and update the following policies in an effort to combat modern slavery and enhance our compliance programme more generally. Our Modern Slavery Policy, which is of most direct relevance. It reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our other policies assist by encouraging both ethical practices and the reporting of breaches of policies / related concerns. Each of these policies are stored on our SharePoint site, accessible to all employees.

- Code of Conduct
- Modern Slavery Policy
- Safety, Health, Environment and Quality (SHEQ) Policy
- Sustainability Policy
- Sustainable Procurement Policy
- Whistleblowing Policy



- Risk assessment

- 2.2** Human rights abuses can occur at all levels of an organisation, and we have identified that our main area of risk is within our supply chain, which includes agency workers, subcontractors, and the supply chain workforce.
- 2.3** To mitigate these risks, we choose to work with certain contractors / labour providers who have evidenced the implementation of their policies, through right to work checks, site inspections, and any bank account checks undertaken by contractors. We also endeavour to ensure that every supply chain partner is registered and approved through Constructionline, after having evidenced the implementation of their policies. This enables us to assess the most ethical supply chain and mitigates risk.
- 2.4** Although the fact that our supply chain is UK based facilitates easier and more direct engagement, an ongoing challenge for the Cardo Group of companies has been obtaining greater transparency beyond our first tier partners. To address this risk, we ensure that our suppliers conduct their own modern slavery due diligence, evidenced in their own modern slavery statements.

Supply chain due diligence

- 2.5** Supply chain Partners: We recognise the immense importance and value of our collaborative working relationships with our supply partners to combat modern slavery.
- 2.6** Our supplier strategy has been to develop a supply chain community that shares our company values, as well as promoting and visibly demonstrating these values through behaviours at both a corporate and individual worker level. We endeavour to nurture

relationships that encourage our subcontractors and suppliers to adopt our company values and are committed to the highest standards of business ethics, quality, and safety performance to help us achieve our business outcomes. We have a structured list of strategic, preferred, and approved Supply Chain Partners to assist our efforts in this area.

- 2.7** Due diligence: Part of our approach to identifying and selecting supply partners is a pre-qualification questionnaire. We are enhancing this by solely using Constructionline as a pre-qualification checking method, in order to strengthen the due diligence process and further reduce this risk of Modern Slavery in our supply chain.

Learning and awareness

- 2.8** We are a partner of the Supply Chain Sustainability School and a supporter of the Institute for Business Ethics. This has enabled us to launch a new modern slavery e-learning, which has been rolled out to the business and has become a mandatory piece of learning for all of our new employees to complete in their first 3 months of employment.
- 2.9** Our zero-tolerance approach to modern slavery has been promoted in the following ways:
- 2.10** A campaign to promote the issue of modern slavery through posters on-site and in our offices, alongside an electronic outreach.
- 2.11** Articles in our newsletter, which reaches all Cardo Group employees, outlining the importance of the eradication of Modern Slavery.
- 2.12** A newsletter is produced and distributed to our supply chain which includes content on Modern Slavery and best practice examples.



Measuring effectiveness

2.13 Whilst we have not identified any instances of modern slavery within our business operations, we recognise that modern slavery can be hidden in supply chains. Our approach to modern slavery will continue to be reviewed and monitored, including by reference to our Sustainable Procurement Policy.

Next steps

2.14 We understand that modern slavery risks are not static and that more can always be done. We endeavour to continue to mitigate modern slavery risks in the years to come through continually reviewing our approach. Currently we are working towards:

- Engagement on the issue with the GLAA (Gangmasters & Labour Abuse Authority) and a leading NGO, Stronger Together.
- Working towards making our modern slavery communications (posters on-site and in office, both physical and electronic) more inclusive (multilingual messaging). The communications will also be enhanced through the inclusion of further detail on how to spot red flags and what action to take.
- Expanding due diligence on subcontractors and suppliers and the introduction of related clauses into contracts.
- Continuing to enhance our pre-qualifications tools, right to work checks and recruitment checks.
- Continue to deliver training to our supply chain on Modern Slavery.
- Continually review our risk inherent assessment and develop action plans to further mitigate risks for high-risk trade categories

- Development of a supply chain code of ethics to ensure it is line within current best practice.

To raise concerns:

- Guidance on reporting suspected slavery can be found at the Home Office's website: www.modernslavery.co.uk.
- Suspicions of modern slavery existing or being connected to any Company within the Cardo Group or supply chain can also be reported to your line manager, any senior leader, People Services, Head of People, or the Managing Director.
- National helplines (any language) and reporting:
- Modern Slavery Helpline – 0800 0121700 or www.modernslaveryhelpline.org/report
- GLAA – 0800 4320804 (08:00 – 16:00) or email: intelligence@gla.gov.uk
- If you are worried that the individual is in immediate danger, phone 999.

This statement applies to Cardo Group Limited and its subsidiary companies, including:

Cardo South

LCB Group

Jefferies Contractors Limited

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