

**This policy statement sets out the approach Carmel Group and its subsidiaries has taken with the aim of ensuring that modern slavery or human trafficking is not taking place within our business or within our supply chain.**

All Carmel Group companies reply upon this statement, where necessary, for the purpose of complying with their individual annual reporting requirements of the Modern Slavery Act 2015. The approach and processes referred to within the statement are relevant to all group companies and Carmel will monitor their performance in complying with its requirements.

This aim of this policy statement is to communicate our responsibilities and highlight the risks that modern slavery and trafficking pose to our business, clients and supply chain.

Carmel Group is a Mechanical and Electrical Contractor providing programme and project management, cost consultancy, design, supply and install.

Our Philosophy and Vision is the core values under which Carmel Group operates. Carmel is committed to being a responsible business and to upholding high ethical standards in all our operations, including those of our supply chains. Our commitments are summarised in our policies.

The Global Slavery Index presents significant evidence that highlights the risk that labour standards issues could be present in construction and supply chains, in the production of construction materials, delivery of construction activities and through the provision of professional services equipment such as laptops and phones. To identify and mitigate the risks of slavery and human trafficking. Carmel takes the following focussed approach to the procurement of labour, goods and services.

- Identification of issues and risks
- Collaboration with our Clients, peers and suppliers
- Clear definition and contractual communication of our expectations
- Review and assessment of supplier compliance
- The resolution of challenges through training and supplier development.

Carmel Group uses Sub-Contractor Screening Form for all our suppliers. We also undertake further due diligence of suppliers using the Supplier Ethical Data Exchange (SEDEX). These tools assess suppliers against labour standards, health and safety, environmental and business ethics criteria, identifying issues and risks. Where issues are identified, Carmel works with sub-contractors to seek resolution through training and development. If the issue is deemed serious and / or is not capable of remediation Carmel will remove the Sub-contractor from our supply chain unless and until the issue is fully resolved.

We recognise that certain jurisdictions are considered high risk and have different legal and cultural frameworks. We work with clients, suppliers and sub-contractors to understand the risks and mitigate them within the parameters of local law.

We deliver compulsory training for Carmel staff and sub-contractor chain leadership teams on the risks of slave labour and human trafficking and how to spot the signs of any potential issues. Carmel also provides specialist guidance to project procurement teams where there are deemed to be significant risks. In further support of this, we have developed guidance on modern slavery and trafficking in tow key areas of activity:

1. Procurement of materials and services
2. Supervision of operatives/workers

Where staff have concerns around issues of forced labour, human rights, recruitment practices or exploitation, they are encouraged and expected to report concerns to management via a confidential email address ([hr@carmel-group.co.uk](mailto:hr@carmel-group.co.uk)). All reports will be investigated by the Group Managing Director.

# Modern Slavery and Human Trafficking Policy Statement

We will continue to review and, evolve our approach as we gain further understanding of the risks presented by our business activities and sub-contractors and in line with guidance published by the UK Government.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015.

**For and on behalf of the board**



**Chris Clarke**  
Managing Director  
November 2017