

Modern Slavery Statement - 2019

Carter Lauren Construction Ltd. recognises its responsibility under the Modern Slavery Act 2015 to ensure sound moral, social, legal and ethical practices within its own operations and within its supply chain.

We acknowledge that every worker deserves the right to live and work with dignity and in a safe workplace. We understand that when workers are treated with respect, work in decent conditions and earn fair rates of pay, both they and their companies benefit from increased commitment and productivity.

Carter Lauren Construction Ltd. vigorously opposes slavery and human trafficking and would never knowingly conduct business with contractors or suppliers engaged in such abhorrent practices.

This statement relates to our activities and actions for the last two financial years up to 31st March 2019 and our commitment for the 2019 / 2020 year ahead.

Company Structure and Business

Carter Lauren Construction Ltd. is a privately owned company that operates solely in the UK. We undertake the role of Principal Contractor providing construction services, including new build construction and refurbishments to our clients in the private sector, along with some public sector projects.

We directly employ approximately 100 staff, 40 of whom are based out of head office in Cardiff, the remainder being predominantly Site Management and Supervision based on our sites across the UK. Our Annual turnover is in excess of £45m and is forecast to continue through steady growth.

Relevant Policies

Carter Lauren Construction Ltd. prohibits its suppliers from using forced labour of any kind. Our Responsible Sourcing and Ethical Conduct Policy 2019 defines both minimum standards and the basic principles of cooperation that we expect from our supply chain.

Further policies have been developed to mitigate the risk of Modern Slavery within our core business activities and supply chains. These policies include;

- Carter Lauren Construction Ltd - Equal Opportunity and Diversity Policy 2019
- Carter Lauren Construction Ltd – Code of Conduct 2019
- Carter Lauren Construction Ltd – Whistle Blowers (protected disclosure) Policy 2019
- Carter Lauren Constructions Ltd - Environmental Materials Policy 2019
- Carter Lauren Constructions Ltd – Anti Bullying and Harassment Policy 2019

Supply Chain

Carter Lauren Construction Ltd. reviews its product supply chain to evaluate human trafficking and slavery risks, this has been done both internally and through external SMETA Auditors. We undertake all reasonable and practical steps, including factory and warehouse audits and if required tier accommodation inspections, to ensure that our standards are being implemented throughout the businesses of our suppliers and that local legislation and regulations are complied with.

Most of our materials and labour supply chains are almost exclusively sourced from within the UK. Prior to a supplier being eligible to work with us they are required to complete our prequalification and approval process. We will assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately. We will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour. We will report these suppliers immediately to the relevant authorities.

We will only trade with those who fully comply with this policy or those who are taking verifiable steps towards compliance. Carter Lauren Construction Ltd. has been a member of the Stronger Together network since 2016. A multi stakeholder initiative aiming to reduce modern slavery (www.stronger2gether.org). A range of measures, guidance and training is made available to all our employees and suppliers to work together to reduce exploitation.

Due Diligence Processes

Carter Lauren Construction Ltd due diligence of new suppliers and review of existing suppliers includes;

- Mapping supply chain.
- Assess product and geographical risk of modern slavery.
- Assess the risk of each new supplier and periodic review of existing suppliers.
- Ensuring nonconformities are closed / and or verifiable steps are taken towards compliance.
- Terminate relationship with any suppliers unwilling to commit to a nonconformities action plan
- Report these suppliers immediately to the relevant authority.

Risk Assessment

Prior to the commencement of a new member of staffs' employment we complete the necessary pre-employment checks to verify the workers' identity and eligibility to work in the UK.

In the same way that we diligently select our approved suppliers to join our supply chain, Labour Agencies are expected to demonstrate the steps taken to ensure that slavery and trafficking is not apart of their business practices. Over the past year we have reviewed and reduced our approved agencies to those that adhere to the highest standards of ethics and best practise in recruitment.

We will not employ those who are unable to provide us with such evidence. Under no circumstances will we make payment to a third party, all employees are paid by Bank transfer.

Measurement of Effectiveness

In the last 18 months we have undergone several '4 Pillar SMETA' Audits testing our key performance indicators specifically in relation to slavery or human trafficking. No non-conformities were raised in relation to Slavery and Human Trafficking, however best practice advice was given. Some of the practical initiatives we have introduced in an effort to achieve best practise include;

- Ethical Trading commitment letter sent with all Tender enquiries and once returned, assess approved / declined / further information requested then filed in our management system.
- Ethical Trading Questionnaire, for all new and existing Subcontractors, requiring written commitment to the ETI
- Worker questionnaire(s), this can be completed anonymously if the worker wishes, it is having been rolled out to all sites.
- We have been using the Considerate Constructors best practise website and eLearning training portal to increase our existing Staff / Managers awareness to issues identified through the ETI, such as preventing Illegal workers course (approx. 85% of our staff have completed this course) <https://www.ccscheme.org.uk/e-learning-launches-on-the-best-practice-hub/> other subjects we have targeted whilst not specifically ETI based include – Value the workforce, Mental Health Awareness, Women in Construction.
- We have been promoting the Stronger2gether network on all our documentation, again initially as an awareness campaign. <https://www.stronger2gether.org/>
- Completed an awareness campaign for the Construction Industry Helpline, including making poster, contact numbers and helpline cards available on all sites.

Training

All new employees are made aware of our commitment to tackle hidden labour exploitation at induction both verbally and via the issuing of an employee handbook. As mentioned above we have spent the last two years raising awareness of the issue, to all staff, whether they are office or site based. We plan to continue these campaigns in 2019 /2020 so that we ensure all members of our team;

- know how to identify the signs of slavery and human trafficking
- understand what initial steps are to be taken if any there is a suspicion of slavery / human trafficking
- know how to escalate the issue to the relevant person within our company.

Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and for the current financial year. This statement is fully supported by and has been approved by our Board of Directors, who as a commitment to continuous improvement, review and update on an annual basis.



Signed:

Date: 11th June 2019

Neil Carter

Managing Director