

Modern Slavery & Human Trafficking Policy

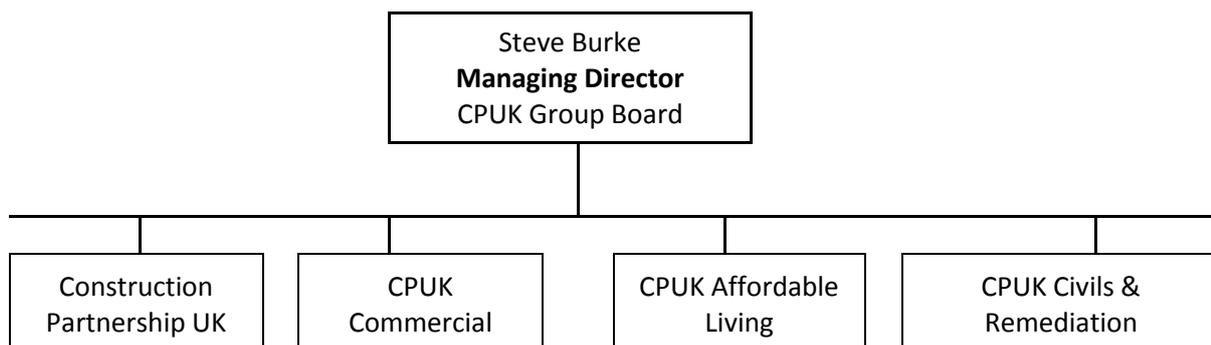
Within the present financial year the firm has implemented a policy, the Modern Slavery Policy, aimed at ensuring that no modern slavery or human trafficking takes place in any part of the firm’s business or supply chain.

The Policy reflects the firm’s commitment to implementing and enforcing effective systems and controls aimed at combating slavery and human trafficking. Responsibility for the Policy rests with the firm’s Board of Directors.

We expect all business we associate ourselves with to uphold the same standards and values that we do and have policies in place that demonstrate their commitment to conduct business in a responsible and ethical manner.

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- identifying and addressing any areas of high risk in our supply chain
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking

Organisational structure



The divisions of the CPUK Group perform all of their work with the UK and our policies apply to each of them without exception. Amongst them, our Corporate Social Responsibility, Equal Opportunities and Health, Safety and Environmental policies demonstrate the importance of ensuring our employees receive the duty of care they deserve.

Processes to Combat Trafficking and Slavery

We are committed to providing our staff with a salary which at least meets the National Living Wage and offering the required statutory leave entitlement. Furthermore, we ensure all our staff have provided their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK.

Ensuring standards in our Supply Chain

CPUK require all our Suppliers and Sub-Contractors to complete an Appraisal questionnaire. The answers from this questionnaire provide us with sufficient information that we are confident our supply chain upholds the same standards, principals and business ethics that we do. If we feel they do not reach our standards, or have progressively allowed their standards to lower, they will cease to be a business with whom CPUK Ltd operate.

Identifiable Areas of Concern in our Industry

The construction industry attracts a workforce from all backgrounds. In the UK, we are able to utilize the skills of employees from across the world, particularly Europe. Whilst the benefit of this influx of workers allows for competitive market, it also has the risk of potential exploitation.

By checking our employees NI numbers or Working Visa's we know they are legally eligible to work in the UK and their salary will be monitored by HMRC. Our Health and Safety Policy, to which all of our supply chain must adhere, ensures that all businesses with whom we work will have taken equivalent steps

Training

In order to ensure proper understanding of the risks posed by modern slavery and human trafficking in the context of the firm's supply chains and our business, the firm intends to provide training to its employees as appropriate.

Signed

A handwritten signature in blue ink, appearing to read 'S. Burke', written over a faint horizontal line.

Name: Stephen Burke

Date: 29.4.16