

## CRUDEN GROUP LIMITED – MODERN SLAVERY ACT

### Introduction

This statement sets out Cruden Group Ltd's actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there are no activities which are associated with slavery or human trafficking within its own business and its supply chains. This statement relates to actions and activities during the financial year ending 30th September 2019.

As part of the UK construction industry, our organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### Organisational Structure and Supply Chains

This statement covers the activities of Cruden Group Ltd and its subsidiaries. The group, which operates across a number of subsectors within the UK construction and property industry, trades through two main subsidiaries, Cruden Construction Ltd and Cruden Property Services Ltd, undertaking general construction, maintenance and ancillary activities.

The majority of our services are delivered through an extended local supply chain, providing both labour, plant and materials.

#### *Countries of operation and supply*

The organisation operates solely in the UK.

#### *High-risk activities*

The following activities are considered to be at high risk of slavery or human trafficking:

- Involvement of slave labour in the production of certain materials imported from overseas.
- Forced labour in work package or trade labour gangs.

#### *Responsibility*

Responsibility for the organisation's anti-slavery initiatives is as:

- **Policies:** The Group board of directors is responsible for the establishment of the policy.
- **Risk assessments:** Risk assessments are undertaken by our buying department and the managers responsible for vetting our subcontractors.
- **Investigations/due diligence:** Investigations and due diligence will be undertaken by our buying department and managers involved with procurement.
- **Training:** Training will be organised through our HR department and will focus on training our senior managers.

### Relevant Policies

Cruden Group Ltd operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of

retaliation. Employees, customers or others who have concerns are encouraged to contact the HR Manager or the Chairman of the Group.

- **Supply Chain Code of Conduct:** The Group is committed to ensuring that its supply chain adheres to the highest standards of ethics. Suppliers and subcontractors are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Cruden Group Ltd works with its supply chain to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our Supply Chain Code of Conduct will lead to the termination of the business relationship.
- **Agency Workers Policy:** Our organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is proposing to use before accepting workers from that agency. All our labour are required to be CSCS accredited, which we believe reduces the risk of slave labour.

### **Due Diligence**

We will undertake due diligence exercises with our supply chain as our policy and knowledge develops. The Group's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking policies of supply chain members;
- Understanding the steps taken by our supply chain in investigating, identifying and preventing human slavery and trafficking within their recruitment practices;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular; and
- Invoking sanctions against any supplier or subcontractor that fails or breaches the legislation requirements in the UK, or who seriously violate our Supply Chain Code of Conduct, including the termination of the business relationship.

### **Awareness-raising Programme**

As well as training staff, Cruden Group Ltd has raised awareness of modern slavery issues by putting up posters across the organisation's premises and sites. The posters explain to staff:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

### **Board Approval**

This statement has been approved by the Group's Board of Directors, who will review and update it annually.

**Carl Brian**  
**Chairman**  
30<sup>th</sup> September 2018