

CUMMING  
GROUP

# Anti-Modern Slavery Statement

Cumming Management Group Inc.

May 2026

[cumming-group.com](http://cumming-group.com)





Revision	Comment	Initial and Date
Rev 1	Aligned rebranded and reviewed	May 2026
Rev 2	Next Review	01/05/2027
Rev 3		
Rev 4		
Rev 5		

This policy and all accompanying documents apply to all Cumming Group companies operating within the UK and EMEA. It is a Group-wide policy and will only vary where local arrangements are legally enforceable in the country of employment or where terms within an individual's employment contract take precedence.

This policy applies to all individuals employed on a permanent, temporary, or fixed-term basis, as well as directors, consultants, and anyone working under the Cumming Group name or brand.

For the purposes of this policy, all such individuals will be referred to as "team members", regardless of role. All team members are expected to familiarise themselves with and comply with this policy.

Throughout this policy, Cumming Group UK/EMEA will be referred to as "the Company".

This policy and any associated procedures do not form part of any team member's contract of employment and may be amended by the Company at any time without notice.

The Company will process any personal data collected during procedures in accordance with its Data Protection Policy.



## Anti-Modern Slavery Statement

### Aim

The Cumming Labour Standards Policy and the CMGI Policy statement on Human Rights and Anti-Human Trafficking Policy 2025 is covered in a statement which can be found on [https://cumming-group.com/en\\_gb/](https://cumming-group.com/en_gb/). The principles and guidelines set out in both those policy are derived from the United Nations Universal Declaration of Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work and The Ten Principles of the United Nations Global Compact and reflect our aim of respecting human rights as laid out in the United Nations Guiding Principles on Business and Human Rights.

The Company seeks to provide a work environment where team members are treated with respect, dignity and consideration. This commitment is built upon a framework of policies and procedures designed to ensure fairness in the recruitment, development and retention of all team members. Details can be found in the Company individual policies and are summarised in the Company Handbook.

### Scope

This policy applies to all individuals employed on a permanent, temporary, or fixed-term basis, as well as directors, consultants, and anyone working under the CG brand or on behalf of CG. Throughout this policy, these individuals will be referred to as “team members”. All team members are expected to familiarise themselves with and comply with this policy.

### Statement

Certain laws in jurisdictions where Cumming Management Group Inc (CMGI) and its affiliates and subsidiaries together ‘the Cumming Group’ operates require businesses to state actions taken during the financial year to ensure modern slavery is not taking place un their business operations and supply chains.

This statement sets out the steps taken by Cumming Group to prevent modern slavery and human trafficking within its organisation and supply chains.

### Business Structure

Cumming Group is an international project management and cost consulting firm with a focus on construction in the education, healthcare, themed entertainment, technology, infrastructure, pharmaceutical and hospitality sectors.

### Supply Chains

We expect all our contractors, supplies and other business partner to adopt the same high standards as we do to prevent modern slavery by ensuring all team members and workers are treated with dignity and respect in a fair and ethical environmental. Our procedural process includes vetting of all potential suppliers with responses being evaluated on the basis of supplier policies and controls. We expect our suppliers to adopt the same principles when contracting with their own suppliers and plan to make this a requirement in 2026.

Our supply chains include: consultants, marketing & PR, recruitment; IT and software services; HR systems, and merchandise suppliers.

Cumming Group considers that the provision of these services and particular supply chains generally present a low risk of modern slavery and human trafficking.

### Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Modern Slavery Policy 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.

Additionally, we adopt the following policies which also contribute to the identification of modern slavery risks and prevention of slavery and human trafficking in Cumming Group’s operations, in the following ways:



- Whistleblowing policy – We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organization.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- Code of conduct – The Cumming Group’s code makes clear to employees the actions and behaviour expected of them when representing the organization. The organization strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Supplier Code of Conduct Policy – this policy includes specific procedures relating to how slavery and human trafficking risks are identified and assessed through the Firm’s procurement processes.

We have a cross departmental team who work on various compliance matters which consists of involvement from the following departments:

Audit, finance and legal.  
Information Technology.  
Human Resources.

#### **Recruitment, Training and Work Culture at Cumming Group**

We are dedicated to maintaining a fair and ethical workplace for all our staff. The organization uses only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency.

Our Whistleblowing Policy enables concerns to be raised and resolved. Those can include any concerns about supplier practices.

It is important to us that our colleagues are aware of the issues surrounding modern slavery and support the firm’s values. We therefore intend to offer a training program for existing employees and personnel to reinforce our zero-tolerance policy and the steps to be taken in the event of any concerns within the coming financial year.

#### **Due Diligence Processes for Slavery and Human Trafficking**

We assess risk related to human trafficking and slavery associated with our supply base, but we are continuing to improve our process for doing so. We intend to implement our Supplier Code of Conduct and require all Suppliers to comply with this policy.

As part of our initiative to identify and mitigate risk we carry out due diligence on our suppliers in an effort to ensure that they comply with slavery and human trafficking legislation, and we provide them with our Anti-Modern Slavery Policy.

#### **Supplier Adherence to Our Values**

We expect all our contractors, suppliers and other business partners to adopt the same high standard as we do to prevent modern slavery, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment. Our procurement process includes the distribution of our Supplier Code of Conduct to potential suppliers.

We have a zero tolerance to slavery and human trafficking. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Cumming Group works with suppliers to ensure that they meet the standards of the Cumming Group Supplier Code of Conduct policy and improve working conditions. However, serious violations of this will lead to the termination of the business relationship.



**Awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we ensure our staff are aware of our obligations to prevent slavery and human trafficking through the publication of this statement, the availability of the policies referred to within it and through a training program to be introduced in the coming financial year.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Cumming Management Group’s slavery and human trafficking statement for the financial year ending 31st December 2026.

**Associated Cumming Group Policies**

Whistleblowing Policy

Labour Standards

CMGI Policy statement on Human Rights and Anti-Human Trafficking Policy