

## **Carrington West Limited - Modern Slavery and Human Trafficking Policy Statement**

Carrington West Limited is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors and partners. The Company acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services. These, as well as the suppliers of services, make up the supply chain within Carrington West Limited.

As part of the company's due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company recognises that certain parts of its supply chain, particularly those involving raw materials and overseas manufacturing, may present higher risks and will monitor these areas more closely.

### **Organisation Structure and Supply Chains:**

Carrington West operates as a recruitment agency specializing in infrastructure sectors across the UK built environment. Our business structure includes recruitment consultants, compliance teams, and operational support, working across various geographical regions. Our supply chain consists of suppliers of goods and services, including recruitment software providers, marketing, and outsourced services. We continually assess all levels of our supply chain for potential risks and engage with suppliers to ensure they are compliant with the Modern Slavery Act 2015.

### **Policies on Slavery and Human Trafficking:**

Carrington West has a comprehensive policy to prevent slavery and human trafficking, which is embedded into our day-to-day operations and supply chain management. This policy applies to all levels of the organisation, and is regularly reviewed to ensure its relevance and effectiveness. The company trains staff regularly on recognising and addressing modern slavery and human trafficking, ensuring compliance with all legal requirements.

### **Due Diligence Processes:**

Carrington West undertakes rigorous due diligence to assess the risk of slavery and human trafficking in its business and supply chains. This includes reviewing and approving suppliers based on their compliance with modern slavery and human trafficking laws, with specific emphasis on high-risk suppliers and products sourced from outside the UK and EU. Audits, supplier self-assessments, and third-party certifications (ISO 9001, ISO 14001) are part of our ongoing efforts to ensure compliance.

### **Risk Assessment and Management:**

We have identified that goods imported from outside the UK and EU present a higher risk for slavery and human trafficking. We mitigate these risks by conducting regular audits of suppliers, requiring compliance with ISO certifications, and ensuring all suppliers sign off on our anti-slavery and anti-trafficking policies. In addition, we maintain open lines of communication with our suppliers to address any concerns that may arise.

### **Effectiveness and Performance Indicators:**

To ensure that slavery and human trafficking are not taking place in our business or supply chains, Carrington West monitors the effectiveness of its measures through key performance indicators. These include the completion rate of supplier audits, the percentage of suppliers that meet anti-slavery criteria, and employee training completion rates. These metrics are reviewed annually by senior management to assess progress and identify areas for improvement.

### **Training and Capacity Building:**

Carrington West provides mandatory training to all staff on modern slavery and human trafficking. This includes a detailed introduction to the issue, how to spot signs of slavery and trafficking, and how to report suspicions. We provide annual refresher training and ensure all new staff receive this training as part of their onboarding. In addition, we work with our suppliers to ensure they are providing similar training to their teams, reinforcing our commitment to addressing modern slavery across the entire supply chain.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking are not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.

This Policy takes into account, and supports, the policies, procedures, and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015 and ISO 14001:2015. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

### **Financial Year Ending 31 December 2025**

### **Modern Slavery Published May 2025**

**Policy reviewed September 2025 – Emily Christmas, Head of HR; Authorised by James Fernandes, Managing Director**