

# Modern Slavery Statement 2024



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the current financial year ending 30th September 2023.

The statement sets out the Company's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business or our supply chain.

## What We Did in 2023

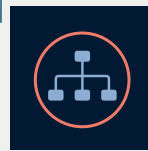
In summary CML:

- Introduced our Code of Business Ethics, which confirms our commitment to preventing Modern Slavery and Human Trafficking
- Continue to work proactively with our supply chain to ensure that they address responses to Anti-Slavery and Human Trafficking questions in their pre-qualification questionnaires, as part of our approval process
- Maintained our eLearning programme throughout the year
- Clearly identifying our policy and procedure for Speaking Out within our Code of Business Ethics
- Have begun to use the Modern Slavery Assessment Tool (MSAT), which will help improve our processes and support a strategy for future goals



## Our Commitment

We believe we have a duty to be alert to the risks and take appropriate steps to ensure there is no form of modern slavery or human trafficking connected to our business or supply chain. We believe in ensuring dignity, equity, respect, fairness, and inclusion for everyone.



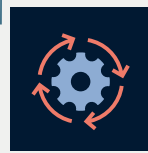
## Organisational Structure

This statement covers the business activities of Construction Marine Ltd (CML) which is the main trading company of CML Group Ltd.

CML is a privately owned civil engineering company based in and operating solely in the United Kingdom.

The company head office is based in Leeds with regional premises throughout England.

Company activities are varied and multi-disciplined across various sectors, including the rail and construction industry.



## Supply Chain

Our supply chain supports our business activities through the provision of materials, plant, labour, specialist trades and professional services. Our supply chain is almost entirely UK based.

To ensure delivery excellence we work collaboratively with our supply chain to build strong relationships that are resilient and ethically sound, using trading partners that share our company values.

## Due Diligence Processes to manage risks of Slavery and Human Trafficking

CML's due diligence process to identify and mitigate risk includes the following:

- We build collaborative and long-standing relationships with our trading partners and make clear our expectations of business behaviour and ethics to mitigate risks.
- We undertake due diligence when considering new trading partners and use our Pre-Qualification System, as required by our Purchasing Procedure, to ensure that the risk of modern slavery & human trafficking is assessed prior to any appointment.
- We regularly review existing suppliers and categorise our spend to understand where there is potential for higher risk.
- Should modern slavery be assessed to be a higher risk, we would require our trading partners to provide their commitment to mitigate risk and combat modern slavery and human trafficking.
- We have in place systems and policies to encourage the reporting of concerns and the protection of 'whistleblowers'.
- We recruit either directly or via a limited number of reputable recruitment partners, who are required to successfully complete our supply chain due diligence process, prior to being accepted as a recruitment partner.
- We have robust recruitment processes in place to ensure that an individual's identity is confirmed and they have a legitimate right to work in the United Kingdom. This significantly reduces the risk of directly employing forced labour or those who may be subject to human trafficking.



### Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chain, we communicate our policy to staff for their awareness via HR communications and toolbox talks. The policy is made clear at Induction to all new employees joining our company, which is in line with our Recruitment and Induction Policy and Procedure.

Individuals interfacing directly with our supply chain receive specific training on the relevant legislation and how to recognise the potential risks of slavery and human trafficking and the requirement to report their concerns.



### Responsibility

Responsibility for the Company's anti-slavery policy sits with the Managing Director.

We regularly review the measures we have in place to avoid and prevent slavery and human trafficking.

Signed January 2024

**Charles Mortimer**  
Managing Director