

Modern Slavery and Human Rights Policy

Date effective from:	25/07/2025	Policy Reference:	CG-POL-008
Alan Craig	Company Director	25/07/2025	
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Introduction

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

This policy applies to all persons working for C&G Power Services or on our behalf in any capacity, including employees at all levels, directors, managers, agency workers, seconded workers, volunteers, contractors, suppliers and external consultants.

Responsibility for the policy

The C&G Power Services Company Directors have approved this policy. C&G Power Services are committed to the requirements set out within this policy and embedded the principles within our company management systems. As a company C&G Power Services will make sufficient resources available for the implementation of this policy and conduct annual management reviews to measure the compliance.

The C&G Power Services Programme Manager has primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring C&G Power Services employees, workers and temporary staff understand and comply with this policy and are given adequate and regular training.

Policy statement

Modern slavery and human trafficking are criminal offences under the Modern Slavery Act 2015. The act includes the crimes:

- knowingly holding a person in a position of slavery, servitude, forced or compulsory labour
- facilitating their travel with the intention of exploiting them during or soon after.

Modern slavery and human trafficking can take place in a wide range of employment sectors, including engineering and facilities management.

C&G Power Services strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain.

We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or, as far as we are able to do so, in any of our supply chains and to ensure that wider human rights are similarly respected.

C&G Power Services is committed to establishing a leadership and culture within the business that understands the importance of protecting Human Rights in everything we do.

We will actively assess the impact of our business on Human Rights and encourage our leaders to develop business practices that do not directly or indirectly violate the Human Rights of people who are impacted by our operations and services.

C&G Power Services has a responsibility to respect the human rights of our employees and we will endeavour to respect the human rights of all other persons working for us or on our behalf (including contractors, agency workers, business partners, suppliers and workers in our supply chains) and of our customers and other stakeholders. We expect that our suppliers will hold themselves and their own suppliers (including, without limitation, sub-contractors, material suppliers and labour providers) to the same high standards.

We both expect and require all of our employees to engage with us to support the human rights of others and commit to the continuous improvement of our human rights performance.

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for C&G Power Services or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

- We are committed to gaining a clearer understanding of how modern slavery operates in different contexts, of who is affected and how, and of the risks of modern slavery existing within our industry.
- We are committed to having a clear and transparent company statement, which is reviewed regularly and is communicated to our employees and posted on our website.
- We are committed to training all of our employees in modern slavery, how to identify it in practice and how to respond.
- We are committed to ensuring all of our Senior Management Team are adequately trained and embrace our key business values which include a zero-tolerance approach to modern slavery and importance of protecting human rights.
- We are committed to ensuring that our employees understand and adhere to this policy and non-compliance with it is a disciplinary offence. We have outlined our clear expectations to complying with this policy within our C&G Power Services Code of Conduct.
- We expect all of our employees to comply with the C&G Power Services Code of Conduct and sign to confirm they have read and understood the requirements. This is also applicable to agency, temporary and zero hours staff working for C&G Power Services.
- C&G Power Services conduct audits on our supply chain, based on risk, for their compliance with our Sustainable Supply Chain Charter and Supplier Compliance Database. We aim to work with suppliers to remediate incidents of non-compliance and may terminate the relationship in response to gross, persistent or deliberate failures. We apply rigorous testing at the tendering stage and when auditing key suppliers. This determines if a supplier and its supply chain are adhering to our standards. We require all approved suppliers to complete a Modern Slavery and Human Trafficking statement formally accepting our terms and confirm they do meet our standards.
- We train all of our Senior management team members including procurement colleagues to apply good practice in preventing modern slavery and human trafficking and promoting social value. We train our engineers to monitor compliance within our team to ensure they are aware of our standards, what to look out for and how to report any issues.
- When we procure goods and services, we comply with UK legislation and government policies. We also apply our contract terms and conditions relating to modern slavery and human trafficking. These are in line with the government policy thresholds and relate to the value and type of goods, services and commodities required.

Reporting Modern Slavery

Individuals must notify the C&G Power Services Senior Management Team as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy.

Individuals can also refer to the Whistleblowing Policy for guidance on reporting concerns.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.