MODERN SLAVERY Statement 2023

STATEMENT OF INTENT October 2023



<u>Introduction</u>

C.R MacDonald are a surfacing company, operating within the UK, involved in various surfacing works and schemes. We employ circa 200 staff comprising of direct employees and subcontractors who work together across our operations. Our suppliers range from asphalt specialists to builder's merchants, and these are all based within the UK, with many of them being local to our head office in Redditch, Worcestershire.

Our policies

We have a number of policies which are designed to manage the risks relating to modern slavery and human trafficking, including our Code of Conduct, Anti-Slavery and Human Trafficking Policy, Employee Handbook, Responsible Procurement and Whistleblowing Policy. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of these policies.

Our Commitment

We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply chain. These policies illustrate our commitment to protecting the human rights of those working within our business and supply chain.

Risk Assessment, Prevention and Mitigation

The risks relating to modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of materials or services. As a result, we require our suppliers and sub-contractors to ensure that there is no slavery or human trafficking in their own supply-chains.

If issues are identified, through the Supplier & Subcontractor approval process, then approval may not be granted until the required remedial action has been taken.

The Construction industry remains a high-risk sector particularly due to the nature and profile of the businesses that operate within it. To ensure legal compliance and safeguarding, we have implemented the following control measures;

- 1. We have reviewed and updated our company Modern Slavery Policy.
- 2. We require our suppliers and sub-contractors to acknowledge their responsibility and obligations relating to modern slavery and human trafficking. This forms part of our Supplier and sub-contractor approval process, which is reviewed annually.
- 3. We have raised awareness of Modern Slavery through use of the company notice boards, providing contact details for victims to raise the alert and seek help.
- 4. We undertake checks on new employees to ensure that they are eligible to work in the UK (Ref: Gov.uk)
- 5. We are members of the Supply Chain Sustainability School (Silver level member)
- 6. We deliver training to our Procurement team and Senior Management about modern slavery and human trafficking and how to take steps to prevent it.
- 7. We undertake periodic reviews of wages/earnings to ensure that no one earns less than the national minimum wage or national living wage.

Doc No:	IMS-POL-09
Revision:	4
Date:	18/10/2023
Page:	Page 1 of 2

MODERN SLAVERY Statement 2023

STATEMENT OF INTENT October 2023



Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking. The next steps will include:

- 1. Our contractual terms shall include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-Slavery and Human Trafficking Policy
- 2. We shall undertake audits of certain key supply chain partners to assess their controls and learn from best practice.
- 3. We shall encourage supply chain partners to undertake training in relation to Modern Slavery and the steps to take to prevent it.
- 4. We shall publish our Financial Year 2023 Modern Slavery Statement on the UK Government's Modern Slavery Act statement registry.
- 5. We shall develop KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes C R MacDonalds Modern Slavery and Human Trafficking statement for the financial year ended December 2023. It was approved by the Board of Directors on 18th October 2023.

Callum MacDonald - Director

AUTHORISED BY:

 Doc No:
 IMS-POL-09

 Revision:
 4

 Date:
 18/10/2023

Page: Page 2 of 2