



## **Anti-Slavery and Human Trafficking Policy**

### **Policy Statement**

The Board of Directors of CPS Building Services recognises that modern slavery is a crime and violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. All of these activities have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

CPS Building Services has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business dealings and relationships. This will be achieved by implementing and enforcing effective systems and controls to ensure modern slavery does not occur anywhere in the CPS Building Services operations or in its supply chain.

The Board of Directors is also committed to ensuring transparency in all of the CPS Building Services business activities and in our approach to ensure modern slavery does not occur in any of our supply chains. This will be consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect these same standards from all our sub-contractors, suppliers and other business partners.

The scope of this policy applies to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, sub-contractors, agents, external consultants, third party representatives and business partners.

### **Responsibility for the Policy**

- The CPS Building Services Board of Directors has overall responsibility for ensuring that this Policy complies with all legal and ethical obligations as well as ensuring that all employees and our supply chain comply with it.
- The Human Resources Manager has primary and day to day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it and periodic auditing of relevant internal control systems and procedures to ensure they are effective in countering modern slavery.
- Management at all levels are responsible for ensuring those who report to them understand and comply with this Policy by way of adequate and regular training on it and the issue of modern slavery in supply chains.
- The Human Resources Manager will seek to encourage comments, suggestions and queries from employees on the Policy, its implementation and content. This will enable effective review of the document. The CPS Building Services will seek similar feedback from the supply chain for this Policy review process. This Policy is reviewed at least annually.

### **Compliance with the Policy**

All employees, sub-contractors, suppliers and other business partners must:-



- Ensure they read, understand and comply with this Policy;
- Prevent, detect and report modern slavery in any part of the CPS Building Services and business or its supply chains;
- Avoid any activity that might lead to or suggest a breach of this Policy;
- Raise concerns with a line manager or director if a breach or any issue under this Policy is suspected or believed to have occurred at the earliest opportunity.

It is also Company policy to ensure that no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of the CPS Building Services. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern under this Policy.

### **Communication and Awareness of this Policy**

Training in respect of this Policy and the risks to the CPS Building Services from modern slavery in its supply chain forms part of the induction process for all employees and contractors. Suppliers and business partners will also be made aware of our zero-tolerance approach to modern slavery at the outset of our business relationship with them and reinforced appropriately thereafter.

### **Breaches of the Policy**

Any employee who, after investigation, is deemed to be in breach of this policy will be subject to disciplinary action which may result in his/her dismissal.

The business relationship with sub-contractors, suppliers and business partners will be terminated in the event of a breach of this Policy.

The business notes that when a turnover of £36 million is reached, it is required to prepare and publish a slavery and human trafficking statement for each and every financial year.

A handwritten signature in black ink, appearing to read 'Liam Connelly', is positioned above the printed name.

Liam Connelly  
Chief Executive Officer

Reviewed: 7<sup>th</sup> December 2024

Next Review Date: 6<sup>th</sup> December 2025