



Modern Slavery Act Statement

This statement outlines how the R G Carter Group (the Firm') fulfils its obligations under the Modern Slavery Act 2015.

We are a construction company based solely in the United Kingdom. Our head office is in Drayton, Norwich, with regional offices located across East Anglia.

We are committed to act ethically, with integrity and transparency in all our business dealings and to implement effective systems and procedures to, as far as practically possible, ensure that slavery and human trafficking does not take place within our business or supply chain.

We proactively manage the risk of modern slavery and human trafficking by reducing the likelihood of it happening either in our own operations or those of our supply chain. The following sections detail how we achieve this through periodic risk assessments, thorough due diligence, continuous engagement and training with employees and the supply chain, collaboration with external stakeholders, and remediation when necessary.

The Firm has a zero tolerance to this issue and likewise expects our people, suppliers and subcontractors to have the same. We all have a duty to be alert to the risks in our business and the wider supply chain. Staff are expected to report concerns that they have to their respective Managers, who in turn are required to act if concerns are raised.

Our Policies

We have a Modern Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We also have other policies to help combat modern slavery including our Public Interest Disclosure Policy (Whistleblowing).

Our modern slavery policy specifically prohibits activities linked to slavery, servitude, forced or involuntary labour and human trafficking. It prohibits employees from being charged for any recruitment fees or deposits, retaining their identity documents, restricting freedom of movement or forcing them to work excessive hours.

It requires that all employees are given contracts of employment, treated humanely, equally and fairly, and paid at least the minimum wage without delays or unlawful deductions and that all migrant workers are treated in accordance with UK legislation and existing Group HR policies.

The policy also requires that employees are hired directly whenever possible; if using a recruitment agency, we must ensure that the agency operates legally, is certified or licensed by the competent authority, and does not engage in fraudulent behaviour that places employees at risk of forced labour or trafficking for labour exploitation.

Whistleblowing and grievance processes

If any employee or subcontractor has a concern or grievance, suspects a breach of policy, or is witness to an event that does not confirm to our Firm's Values, Group Standards of Conduct or Modern Slavery Policy then they can communicate anonymously and in full confidence via General Managers or HR Director. This grievance procedure allows for anyone to report without fear of retaliation via telephone or email.

Our whistleblowing procedures are explained to all employees and subcontractors on induction, formally trained and refreshed by e-learning course on the training portal via the R G Carter Academy every three years, refreshed every six months by tool box talks, published on R G Carter Construct, and made readily available via office and site notice boards.

Any issue that has been raised is thoroughly investigated by our HR Director and associate managers and the

Board is notified of any reports of non-compliance. All issues are resolved in an appropriate manner, in 2024 there were no issues raised across the Firm.

If an incident were to be suspected we would investigate through our internal audit team, engage with our supply chain to ask them for further detail and background on how the incident occurred, and ensure that they understand the severity of the issue.

Our Supply Chain

As is common in the construction sector, we have a large and complex supply chain, due to the nature of our operations and sectors within which we operate. We work with suppliers that provide supply and installation, raw materials, finished goods, labour only providers, employment agencies, consultants and specialist advisors.

We do not regularly procure any materials direct from overseas and only trade with UK suppliers who carry out their own modern slavery compliance checks. We recognise that some of these suppliers may source products themselves from non-European Union (EU) high risk countries, however their own compliance checks minimise the risk of breaches in the Modern Slavery Act.

All suppliers, regardless of spend, are vetted and we collect relevant evidence from all suppliers related to employment policies and modern slavery.

When sourcing materials, we evaluate sourcing opportunities with reference to ethics, sustainability and location where at all possible. Where materials are specified by clients, we work collaboratively to influence their choices including selecting sustainable and ethically sourced/produced materials.

We reserve a contractual right to carry out periodic compliance audits on the supply chain and/or request additional information and evidence in respect of a wide range of matters which include compliance with the Modern Slavery Act and the Firms' own standards we have set in relation to the risk management of anti-slavery and human trafficking. These processes are completed through our internal audit capabilities and documentation systems.

Assessing Risk

We have systems in place to:

- identify and assess potential risk areas in our supply chains.
- mitigate the risk of slavery and human trafficking occurring in our supply chains.
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

When we recruit new employees, our preference is to recruit directly, when this is not possible and we are reliant on the services of agencies. We always use reputable organisations, however we ensure that they comply with the Modern Slavery Act and is included in their terms and conditions for providing services for us.

This helps us remain compliant when recruiting contingent labour and temporary staff by providing multiple levels of verification of candidates, including right to work in the UK.

Where this risk cannot be reduced to an acceptable level we will, where possible, source alternatives that meet our ethical and sustainability aims. By working with long established supply chain partners, we have developed collaborative relationships that enable us to challenge and work together to achieve these aims.

Awareness and training

We proactively promote awareness, via all colleagues and supply chain partners and reporting of any suspected incidents, of modern slavery, unfair treatment or coercion either within our businesses or within our supply chain.

As part of the onboarding and induction processes, all relevant new employees to the Firm are required to undertake e-learning via the R G Carter Academy training portal on modern slavery, these include but are not limited to General Managers, Construction Directors, Contract Managers, Project Managers, Quantity Surveyors and Site Managers.

The four modules of the e-learning course are designed to give employees the ability to prevent and report modern slavery and exploitation. They describe the seriousness of modern slavery, detail the legislation intended to protect people who are affected and how such criminal activity can be identified and how to stop it.

All modules conclude with a test to assess employees' understanding of how to identify the risks and signs of modern slavery and a score of 80% is required to successfully pass the test.

The e-learning course is refreshed every three years and monitored by our Training Academy and training coordinators.

Furthermore, site workers including subcontractors are required to attend additional six monthly toolbox talks on modern slavery. Site Managers are provided with supervisor briefings on the topic and links to learning materials.

In 2024 we undertook in excess of 500 hours of e-learning training through our academy and over in excess of 150 tool box talks by our senior site teams on our construction sites.

Key performance indicators

As a group, we have historically reported against the following key performance indicators:

- employee training.
- investigations undertaken into reports of modern slavery and remedial actions taken in response.
- internal auditing.

Internal Audits

The monitoring of compliance to the Modern Slavery Act is part of our internal audit programme. This examines our policies and procedures aimed at identifying, preventing and mitigating human right risks.

The Board reviews the Firm's annual modern slavery and human trafficking statements and, as part of its review, considers both the requirements of the Modern Slavery Act and the Firm's actions and future actions to ensure the risk of modern slavery is being appropriately managed.

Two internal audits were undertaken in 2024, the last being in November 2024 were only opportunities for improvements (OFI) where identified. Corrective actions have been successfully concluded.

Steps we have taken

We have taken the following steps to ensure that modern slavery and human trafficking does not feature in our supply chains or our business. We:

- include protocols during our recruitment process which are designed to ensure that modern slavery does not feature in our business.
- carried out awareness campaigns on how to identify and report modern slavery during Modern Slavery week at all locations in October which included posters in different languages being displayed at site offices.
- use MRZ checking software to check the validity of identity documents as part of our recruitment processes.
- provide materials to staff and those working on site during our induction processes including posters and support material and confidential reporting/support at all locations.
- will continue to undertake e-learning training for employees via our academy
- have resources in relation to modern slavery (including induction materials, posters and

toolbox talks/training sessions) available on the intranet, Construct, for all colleagues to access at any time.

In addition, we will continue to:

- periodically analyse our supply chain and engage with our suppliers in relation to our aims and compliance with our modern slavery requirements.
- implement Construction Line Gold standards for our suppliers. This sets out higher standards for environmental, social sustainability and modern slavery vigilance. Construction Line manages the process and reporting of completion and compliance.
- be members of Stronger Together to support our aims.
- be members of the GLAA Construction Protocol.
- use GLAA active license checks on labour only employment agencies;
- achieve a green rating on the Crown Commercial Modern Slavery Assessment Tool (MSAT).

Effectiveness

We have had no suspected or actual incidents of modern slavery reported directly to us this year.

Further steps

We plan to build on work already carried out by taking the following steps:

- Continue to mandate modern slavery e-learning, with a target of 100% of our colleagues that procure and manage labour and sub-contractors.
- Continue to reinforce of our expectations in relation to right to work and responsible recruitment practices through our supply chain, including Construction Line Gold certification to all key members of the supply chain.
- Continue to deliver toolbox talks/training sessions at all locations on the identification and prevention of human trafficking and modern slavery.

Accountability

The Group Company Secretary is accountable to the Board and responsible for overseeing compliance with the Modern Slavery Act and annual preparation of the Modern Slavery Act statement.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st December 2024. This statement is made on behalf of all R G Carter companies, including:

1. R G Carter Construction Limited
2. R G Carter Cambridge Limited
3. R G Carter Limited
4. R G Carter Lincoln Limited
5. R G Carter Projects Limited
6. R G Carter Southern Limited
7. The Eyre Group Limited
8. Drayton Windows Limited

Signed:

A handwritten signature in black ink, appearing to be 'J Moynihan', with a long horizontal line extending to the right.

J Moynihan
Director of HR and Business Systems

Review Date: 1 March 2026