



MODERN SLAVERY STATEMENT

R G Carter is committed to conducting all business activities ethically, transparently and with integrity and adopt a zero tolerance approach to modern slavery and human trafficking in any form.

The UK Government expects organisations to take proactive steps to identify and mitigate these risks within their business and supply chains and as a UK construction contractor, we recognise that risks may arise through:

- subcontracting arrangements;
- labour agencies and temporary workers;
- complex supply chains; and
- materials sourced from higher-risk regions

Particular attention is given to the following higher risk areas;

- labour-only subcontractors
- off-site manufacturing
- overseas material sourcing.

We are committed to working with employees, subcontractors, suppliers and clients to prevent, identify and address any form of exploitation.

PURPOSE

This policy sets out R G Carter's approach to:

- preventing modern slavery and unethical labour practices;
- ensuring compliance with the Modern Slavery Act 2015;
- defining responsibilities across the business;
- supporting effective reporting and escalation; and
- promoting continuous improvement in supply chain standards.

SCOPE

This policy applies to:

- all R G Carter employees
- agency workers, apprentices and temporary labour;
- subcontractors, consultants and suppliers; and
- any individual or organisation working on our behalf.

It applies across all projects, offices, sites and supply chains under R G Carter's control or influence.

OUR COMMITMENTS

R G Carter will:

- maintain a zero-tolerance approach to modern slavery;
- identify and assess risks within our operations and projects;
- carry out proportionate due diligence on our supply chain;
- ensure responsible sourcing and procurement practices;
- not knowingly engage with any organisation involved in exploitative practices;
- provide clear reporting channels for concerns;
- investigate issues promptly and take appropriate action;
- review our practices regularly; and
- increase via training our staff understanding of modern slavery

RESPONSIBILITIES

The Board / Senior Leadership Team is responsible for:

- approving this policy and annual modern slavery statement;
- promoting an ethical culture across the business; and
- overseeing compliance and effectiveness.

Employees

All employees must:

- comply with this policy;
- remain vigilant to risks;
- report any concerns; and
- support investigations if required.

SUPPLY CHAIN CONTROLS

R G Carter operates a risk-based approach to supply chain management, which may include:

- supplier pre-qualification checks (e.g. competence, compliance, policies);
- review of labour practices and use of agency workers;
- ethical or modern slavery questionnaires;
- contractual commitments to comply with antislavery legislation;
- right-to-audit provisions where appropriate;
- monitoring high-risk suppliers; and
- corrective action plans where issues are identified.

RECRUITMENT AND SITE LABOUR PRACTICES

R G Carter is committed to fair and lawful labour practices and will:

- verify right-to-work documentation for our own staff.
- avoid recruitment fees where inappropriate;
- use reputable labour agencies; and
- ensure workers are paid fairly and in line with legal requirements.
- no unlawful retention of identity documents such as passports.
- prohibit forced, bonded or compulsory labour;

REPORTING CONCERNS

All employees, subcontractors and suppliers must report concerns about modern slavery. On site concerns should be raised to the site manager who will escalate to the Project Manager and take the appropriate steps and actions. Concerns can also be raised by following the whistleblowing policy and procedure.

Reports will be handled seriously and confidentially. Individuals raising genuine concerns will not suffer any detriment.

RESPONDING TO CONCERNS

Where potential modern slavery is identified, R G Carter will:

- assess the risk and severity;
- investigate appropriately;
- engage with the supplier or labour provider;
- implement corrective actions;
- suspend or terminate relationships where necessary; and
- involve authorities or specialist organisations if required.

We will adopt a measured, responsible response to avoid unintended harm to affected individuals.

TRAINING AND AWARENESS

R G Carter provides training via an e learning course to raise awareness for relevant roles, including:

- procurement and commercial teams;
- site managers and supervisors.

Training will cover:

- identifying signs of modern slavery;
- risk areas within construction;
- reporting procedures; and
- responsibilities under this policy.

MONITORING AND REVIEW

We will monitor effectiveness through:

- supplier due diligence and audits;
- project and site inspections and ethical practice questionnaires
- training completion;
- feedback and reporting; and
- review of incidents and actions taken.

BREACHES

Failure to comply with this policy may result in:

- disciplinary action for employees; and/or
- termination of contracts with suppliers or subcontractors.

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 2026. This statement is made on behalf of the following companies:

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. Eyre Group Limited
8. Drayton Windows Limited
9. Youngs Doors Limited
10. G M Piling Limited
11. Ground Technology Services Limited



Rob Alflatt
Group Company Secretary

Review Date: June 2027