

Modern Slavery and Human Trafficking Statement FY2022/2023

This document, published in accordance with the requirements of the Modern Slavery Act 2015, sets out the policies, processes and actions we have taken during the financial year which ends on 31st December 2022 to prevent modern slavery in our businesses and supply chains. It is intended to cover all the business and undertakings of Compliance Group Limited, (CGL).

CGL, is committed to the continuous improvement of our practices to combat modern slavery and human trafficking. We have a zero- tolerance approach to all forms of modern slavery across our Company or its subsidiaries. We are committed to ensuring everyone who works for CGL does so in an environment where fundamental human rights are upheld, we expect anyone that we do business with also upholds these principles as well. We are continuously working to improve our operations in practice reflect that expectation.

Our Business Overview

CGL are a leading integrated provider of safety and regulatory compliance services across electrical, fire and water – each delivered by our specialist divisions. As a trusted compliance partner, we help our clients to reduce risk, improve safety and assure regulatory compliance in a wide range of sectors including Education, Health, Care Homes, Public Sector, Local Authority, Industry, Pharmaceutical, Hospitality, Leisure, Food & Beverage, Retail and Media. We as a collective have more than 2500 clients. Our aim is to ensure our clients are compliant with UK legislation. Collectively the group has circa 300 employees.

Our Supply Chain

With over 210 active suppliers, it's crucial that CGL understands the level of risk posed by its suppliers in a modern slavery context. Most suppliers are based the United Kingdom however we do have suppliers based out of Europe; these suppliers equate to circa 5% of our supply chain network.

Our Governance & Policies

CGL's commitment to human rights and the eradication of modern slavery is shared throughout the business. Our policies support CGL and its subsidiaries in mitigating risks, both within our business and our supply chain. Responsibility for managing these policies varies policy to policy. However, our annual modern slavery statement is ultimately approved by our board of directors and signed off by our Chief Executive Officer.

a. Anti-Modern Slavery and Human Trafficking Policy

This statement is reviewed and updated each year, with an updated policy that was last issued in December 2022. The policy is an internal document that sets out the expectations we, as a business, have in relation to our zero-tolerance approach to modern slavery and human trafficking. It applies to all individuals working in CGL and its subsidiaries no matter what position is held (whether they are permanent, fixed term, or temporary).

b. Whistleblowing Policy

This sets out how CGL is committed to prompting high standards of openness, honesty and accountability. Our whistleblowing policy is available for all employees and is communicated annually. It sets out how complaints can be made, including the ability for these to be made anonymously.

c. CGL Code of Ethics Policy

This sets out CGL's expectations on how all employees are expected to behave. This policy is maintained by our HR department. Amongst other things, it requires employees to treat each other fairly and not to discriminate on any grounds, to always treat those who raise concerns of misconduct or malpractice in accordance with CGL's whistleblowing procedures and prohibits doing business with countries subject to trade restrictions, embargoes or sanctions. Failure to comply with this may result in disciplinary action.

d. Recruitment and Selection Policy

This policy is controlled by HR and sets out CGL's commitment to equality of opportunity in recruitment, selection, promotion and all areas of employment. CGL aims to attract high calibre employees by ensuring that our recruitment and selection processes are successful, efficient and unbiased. We recognise that employees are critical to our success, and the utmost importance is placed on ensuring that a consistent, honest and professional approach is applied throughout the recruitment and selection process. This enables us to employ the best people who possess the necessary skills and attributes, and who demonstrate the behaviours essential to fulfil our strategic ambitions.

CGL will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, disciplinary and selection for redundancy.

Risk Management & Due Diligence

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Our Employee's**e. Recruitment and Fair Pay**

To manage potential risks in relation to onboarding our employees, we ensure all our direct hires are subject to standard "right to work" checks, DBS checks and depending on the nature of the work, working permits, we may audit these from time to time. We have focused on employee's wellbeing and taken steps to ensure all our employees are paid fairly.

f. Development of our recruitment processes

Our HR team have been working to develop an in-house end to end recruitment service for our business, the use of external recruitment agencies will be centralised and managed by the recruitment team. It is anticipated that this will have many benefits for CGL, including enabling more control and procedures around how employee's members will join our business. This will also give more centralised control of ensuring all external suppliers of workers to CGL have appropriate terms in place to protect CGL, and any temporary or contract hire relationships.

g. Training and awareness

Our employees play a key role in mitigating risk(s) both within our business and supply chain, and we recognise that appropriate training and communication is essential. Our Learning and Development Team have been working throughout 2022 to build on our training and to launch a new modern slavery training module to all employees to ensure year-on-year improvement in terms of our commitment to identify the risks of, and remove all instances of, modern slavery, human trafficking and exploitation.

h. Communication

CGL recognises communication is an essential part of raising modern slavery awareness within our business. All CGL's policies documents are made available via internal communication channels. This statement will be distributed to all employees via internal communication channels following board approval and will be published on CGL's website.

Part B: Our Suppliers

Our standard supplier terms and conditions require compliance with all applicable law, and reference compliance with CGL's requirements with regard to modern slavery. We reserve the right to terminate the contract or relationship immediately for breaches of these clauses. We expect these suppliers to have suitable anti-slavery and human trafficking policies and processes and conduct due diligence in their respective supply chains.

2. Measuring and Monitoring Progress

Our modern slavery statement will be reviewed annually by the Group HR Director prior to it receiving board approval. This review is completed to ensure we are meeting our ethical and legal obligations and providing up to date information within CGL's statement. This annual review is a great opportunity for us to see how we have performed during the previous financial year, and how we can look to improve in the current year.

Our goals for the financial year ending 31st December 2023:

- **Communication:** Ensure the Modern Slavery statement is communicated to all employees' as well as being uploaded to CGL's website.
- **Training:** Design, implement and deliver relevant training to all CGL and subsidiary employees.

- **Whistleblowing:** Introduce a centralised platform and procedure across the group. Maintain our high level of performance in relation to investigating all reports made in relation to Whistleblowing

3. Board approvals

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by our Board of Directors on 12th January 2023.

Signed by Piotr Nowosad - CEO
12/01/2023

