

**CARTER SYNERGY LIMITED**  
**MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

**Introduction**

This statement sets out Carter Synergy Ltd actions to understand all potential Modern Slavery and Human Trafficking risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

Carter Synergy Ltd is a subsidiary of the Carter Thermal Industries Group (referred to within this document as CTI Group). Carter Synergy Ltd are a national provider of Refrigeration and Building Services (HVAC & M&E) design, installation, project management, service and maintenance.

The Company currently operates in the following countries:

- Distribution, installation & service of OEM Manufactured Product throughout the UK
- Export of UK manufactured / assembled product throughout the UK, Eire, and the United States
- Inbound Supply Chain is predominantly from within the UK with global supply from: Switzerland, Sweden, USA, China, Australia, New Zealand, Netherlands, Poland, Italy, Germany, Portugal, France, Ireland, Romania, Czech Republic.

**Our Commitment**

During the financial year 1 January 2023 to 31<sup>st</sup> December 2023 we commit to ensure:

- For all directly employed employees, we will carry out 'Right to Work in the UK' checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of National Minimum and National Living Wage.
- For all indirect workers we will continue to carry out a Health & Safety and Contract Familiarisation prior to their acceptance as a sub-contractor, at which we are able to check their identity, qualifications and competence.
- We co-operate with our clients through regular client audits of our obligations under this policy, and undertake to support the client through effective supply chain management.
- We continue to review and revisit our supply chain partners (3500+), carrying out rolling review to include identification of their individual approaches / commitment to Modern Slavery and Human Trafficking within their Supply Chains to include their countries source(s) of materials, and their labour resources in support of our business operations to identify all and any potential areas / countries of risk.
- We predominantly operate within the UK with the majority of our supply chain partners also based in the UK and we therefore consider the overall risk of slavery and/or human trafficking to be low.

**Risk assessments**

The Procurement department supported by the Group Head of Digital will assess the risk of slavery or human trafficking within the supply chain as part of the Company's overall Risk Management and Governance.

High Risk Activities:

We plan to conduct a rolling risk assessment of all of our supply chain activities across the business, including those overseas countries where there is considered to be a greater material risk of slavery or human trafficking in line with published Government figures. Where we identify a material risk we will conduct supply chain assessment audits to ensure compliance with the agreed policies.

It is the intention of Carter Synergy Ltd to implement updated supply chain processes throughout the coming years including compliance checks to ensure our partners meet or exceed our modern slavery and human trafficking policy requirements.

### **Relevant policies**

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise a concern with the CTI Group HR Director.

**Employee code of conduct:** The Company's code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. All employees are provided with a copy of the Ethical and Business Conduct Handbook upon commencement of employment which they are requested to read through and confirm is understood. Training takes place for key roles across the business on a periodic basis.

**Purchasing & Supply Chain code of conduct:** The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary (RAMS), treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

**Recruitment/Agency worker's policy:** The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency in accordance with the CTI Group Recruitment policy.

### **Due Diligence**

The Procurement department is responsible for ensuring the Company's policies are communicated to the supply chain partners and form part of the supplier assessment process, which is managed by the Internal Audit Department with support from the Group Head of Digital.

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- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier

- Reviewing, on a regular basis, all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments through Carter Synergy Ltd Compliance Team and within 2024 becoming an active member of SEDEX
- Creating an updatable risk profile for each supplier
- Taking steps to improve substandard suppliers' practices
- Participating in collaborative initiatives with our customers for example "Stronger together" or "Ethical trading"

<https://www.stronger2gether.org/resources/>

<https://www.ethicaltrade.org/about-eti/our-members>

### **Key Performance Indicators**

The Company has reviewed its key performance indicators required in accordance with the policy, as a result, the organisation is to achieve the following within the next two financial years:

- All staff involved within any element of Purchasing or Supply Chain, to have completed training on Modern Slavery and Human Trafficking
- Further develop the system for supply chain verification where the organisation evaluates potential suppliers before they enter the supply chain.
- Reviewing its existing supply chains whereby the organisation evaluates all existing suppliers.

### **Training**

All staff working in the procurement team within the organisation will be required to complete training on modern slavery and human trafficking awareness and understanding. This will include distribution and understanding of all available materials from the gov.co.uk website as well as video and reading materials available from the IASC (Independent Ant Slavery Commissioner).

### **Review:**

This policy will be reviewed on an annual basis by the CTI CEO, CTI Group Finance Director, CTI Group HR Director and the Procurement department.

### **CTI Board approval**

This statement was approved by CTI Group Board of Directors

**Director signature:** *Chris Hufflett*

Name: **Chris Hufflett**

Date: 1<sup>st</sup> March 2023