Modern Slavery Statement

1. Organisation

This statement applies to all companies within and associated to CPC Project Services Limited (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 2025 - 2026.

2. Introduction

CPC is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

We are proud to guarantee that we trade according to the following Ethical Trading Criteria:

- All employment is freely chosen
- Working conditions are safe and hygienic
- Child labour is not used
- Zero tolerance approach to any form of modern slavery and human trafficking
- Wages are fair and comparable to industry standard and will always be a least the minimum living wage
- Deductions from wages as a disciplinary measure shall not be permitted
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided for those who are employed on a permanent contract
- No harsh, cruel or degrading treatment or practices are allowed
- No bribery, corruption, blackmailing or bullying is permitted
- Third Party Suppliers and buyers are both free to sell and buy from any number of other businesses
- No restrictions, as a way of guaranteeing business, are allowed

3. Organisational Structure

CPC is an Employee Owned Trust (EOT) which means that CPC is owned by every one of its employees. The CPC Group is managed by its Partners that form its Board. The Board is overseen by a Board of Trustees, which is in place to ensure that the Board act in the best interests of its employees. CPC's Head Office is in London and regional offices in Oxford, Stoke-on-Trent, Manchester, Leeds, Liverpool, Glasgow and Ireland.

CPC offers project consultancy, rail systems, cost consultancy and management consultancy services nationwide and internationally. Our people are committed to working in partnership with clients and delivering service excellence that help our clients succeed and realise their business benefits. The labour supplied to the Group in pursuance of its operation is carried out in the United Kingdom and overseas.

4. Definitions

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

5. Commitment

The Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

6. Supply Chains

To fulfil its activities, the Group's main supply chains include those related to consultancy services, office stationery supplies, company benefit providers, training and PPE supplies in the United Kingdom. CPC understand that the Group's first-tier suppliers are intermediary suppliers and therefore have further contractual relationships with lower-tier suppliers.

7. Due Diligence

The Group undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Our due diligence and reviews include:

- Identifying a risk profile for each supplier via supplier matrix;
- taking steps to improve substandard suppliers' practices, including providing advice where required
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

8. Internal Direct Risk Assessment and Risk Control Measures

Issue	Risk	Risk Control Measure	Process Owner
Not issuing a Contract of Employment	Not issuing a contract of employment means that the rights of the worker are undefined or unclear.	All employees are issued a contract of employment prior to their start date.	People & Culture
Zero Hours Contracts	Zero hours contracts produce uncertainty of if or when working will be provided and can include restrictive clauses preventing the worker working for other employers.	All employees are issued either permanent or fixed term employment contracts.	People & Culture
Paying less than the Living Wage	Under payment of workers means that workers are not receiving a living wage and thus cannot meet their own expenditure and welfare needs.	Accredited member of Living Wage Foundation All employees are paid at least the living wage. All employees are issued a detailed monthly payslip.	CPC Board
Late Payment of Invoices	Late payment of invoices can create cash flow problems in the supplier's company which can lead to pressure on paying their own staff or supply chain.	Suppliers are paid within a timely manner, typically within 30 days.	Financial Controller
Excessive working hours	Working excessive working hours, 48 hours per week, or not providing suitable rest periods – 20 minutes for every 6 hours worked, 11 hours between shifts, one day off per week, can lead to tiredness and fatigue with links to impacts on physical health, mental health, awareness and safety.	All employment contracts are Monday to Friday, 40 hrs per week. A lunch break of 1 hr is granted.	CPC Board People & Culture
		Working hours are limited to 48 hours per week. A Working Hours Opt Out agreement is available for employees wishing to opt out of 48hour week.	CPC Board People & Culture
		Staff working on TfL London Underground or Network Rail infrastructure should follow relevant statutory working time limits, See CPC's Fatigue Management Policy. Where longer working hours are required to achieve business objectives, then a fatigue risk assessment shall be undertaken by the relevant Partner. No worker will be forced to work excessive working hours.	CPC Board People & Culture Line Managers
Entitlement to Work in UK	Lack of entitlement to work in the UK means that the staff member is working without authority or permit and may be	All employees must provide proof of right to work in the UK, e.g. UK Passport or UK Birth Certificate. If	Partner (People & Culture)

	subject to forced expulsion from the country with no rights.	the employee is not a UK or Irish citizen, their right to work in the UK is verified through the Home Office Right to Work Checker, with data access authorisation granted via a Share Code issued by the employee.	
Working in poor physical working conditions	Work in poor physical working conditions, including in workplaces with poor arrangements for health, safety and welfare, can lead to work-related injury and ill-health. Employees and visitors may suffer ill-health from the lack of or inadequate provision of welfare facilities.	Safe and healthy working conditions are provided for the prevention of work-related injury and ill health. CPC offices have adequate welfare facilities including provision of toilets, hand washing facilities, drinking water, heating, ventilation, lighting, space, food preparation areas, waste storage, first aid facilities etc, which are suitable for employees on the premises. Office cleanliness is maintained by contract cleaners. CPC employees may visit construction sites, from time to time for short periods. The lead project manager will ensure that staff have adequate welfare facilities. CPCs has an established health and safety policy and management system, certified to ISO45001, Achilles, and SSIP standards. Staff hold CSCS Skills Cards and other H&S qualifications.	Office Manager or relevant Project Lead
Bullying, discrimination, victimisation and harassment in the workplace.	Poor social conditions in the workplace can lead to mental health conditions, and potentially physical attack.	Bullying, discrimination, victimisation, and harassment is not permitted or tolerated in any form. The Equality, Diversity & Inclusion Policy establishes CPC's position on this.	CPC Board

9. Potential Exposure

In general, the Group considers its exposure to slavery/human trafficking to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Responsibility for our anti-slavery initiatives is as:

- Policies: The People & Culture team are responsible for communication of all policies within CPC and the Marketing Manager has responsibility for external communications. It is the overall responsibility of the Board of CPC for implementation of policies and CPC's SHEQ committee (compliance) for monitoring and audit of policies.
- Risk assessments: The Company's SHEQ team in liaison with the Board are responsible for assessing the risks to the business.
- Investigations/due diligence: The People & Culture & Legal teams are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking,
- Training: All staff who have responsibility to appoint suppliers and hire staff must complete mandatory training via CPC's approved online training provider, which provides the knowledge on how to report, acknowledge and how to handle modern slavery in and around the workplace.

10. Key Performance Indicators

The Group has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Group or its supply chains.

- Require all staff working in the UK and overseas to complete training on modern slavery within 2 months of their appointment.
- Develop and review the process for supply chain verification, whereby we evaluate potential suppliers before they enter the supply chain; and
- Review existing suppliers at least once every 3 years, or annually for those suppliers identified as high risk.

11. Policies

The Group has the following policies which further define its stance on modern slavery.

- Subconsultant and Supplier Approval Policy
- Social Value Policy
- Risk Management Policy
- Whistle Blowing Policy

12.Training

The Group require all staff working in the UK and overseas to complete training on modern slavery on appointment and then at least every 3 years.

Our modern slavery training covers:

- awareness of the different types of modern slavery;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- compliance with the Modern Slavery Act 2015
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation

Additional training is given to all line managers on how to deal with reports of modern slavery and how to assess the risk of slavery and human trafficking in relation to various aspects of the business.

13.Slavery Compliance Officer

The Group has a Slavery Compliance Officer to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Group obligations in this regard.

Slavery Compliance Officer – Brandon Stringer , Finance Partner.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This policy is managed by the People & Culture team and is approved by the Managing Partner.

Steve Mole
Managing Partner
January 2026 Next planned review: January 2027