

Modern Slavery Statement

Introduction

Carnell Group is committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

This statement is made pursuant to s.54, Part 6 of the Modern Slavery Act 2015 and sets out the approach Carnell Group has taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour and human trafficking. It includes both adults and children being forced to work against their free will and is both a crime and an unacceptable violation of an individual's fundamental human rights.

Organisational Structure

Carnell Group is a UK-based civil engineering and infrastructure services provider that specialises in delivering innovative, safety-focused solutions to support critical infrastructure projects. We are a part of the Carnell Group, and our ultimate parent company is Renew Holdings plc. Renew Holdings plc has its head office in West Yorkshire, UK. Carnell Group has over 250 employees and operates nationally in the United Kingdom.

Carnell Group is structured to focus on core sectors like highways, utilities, and environmental solutions. The business is organised to deliver a range of tailored services, including drainage maintenance, structural repairs, asset management, and safety-critical innovations, primarily targeting public and private sector clients such as national highway authorities and utility operators.

Our structure supports scalability, enabling the group to manage both large-scale national projects and smaller, localised works efficiently. Centralised functions such as project management, innovation, health and safety, and client engagement ensure consistency and quality across our service offerings.

Supply Chains

At Carnell Group, we utilise UK based supply chains and consider that any exposure to risk of Modern Slavery or Human Trafficking is extremely low and that should any risk exist, it is most likely to be within the extended Supply Chain. We work closely with their Tier 1 Providers in the identification of such risk to ensure it is addressed in an appropriate manner.

We will continue to monitor our supply chain's compliance with the legislation through initiatives such as desktop audits and the incorporation of Modern Slavery into key supply chain partner reviews.

Carnell Group has received the CIPS Ethical Procurement and Supply Certification, a globally recognised accreditation offered by the Chartered Institute of Procurement & Supply (CIPS). The certification covers critical areas such as preventing corruption, addressing modern slavery, promoting sustainability, and ensuring compliance with legal and organisational standards. By earning this certification, we demonstrate our commitment to integrity, transparency, and ethical excellence in our procurement activities, fostering trust and sustainable business practices across our supply chains.

Policies

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our Ethical Sourcing Policy 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 the following policies in place relevant to modern slavery, which we continuously review and update:

Modern Slavery Statement

- Dignity at Work Policy
- Recruitment Policy

Carnell Group have considered and reviewed the legal, social, and moral aspects of modern slavery, and have adopted a zero-tolerance approach. We have also committed to acting ethically and with integrity in all our business dealings and relationships. Carnell Group are fully committed to the prevention of modern slavery and human trafficking and will not tolerate or condone any such identified act within any aspect of its business activities.

Our Whistle Blowing policy outlines the processes and protection involved and is available to the public via our website www.carnellgroup.co.uk. For additional transparency, we have partnered with Safecall to ensure that we have an independent third-party host, providing a safe and secure means by which people can speak up with confidence.

Due Diligence

Carnell Group conducts right-to-work checks on all our direct workforce, in accordance with the Immigration, Asylum and Nationality Act 2006; we are committed to enforcing similar standards throughout our supply chain. These right to work checks undertaken significantly reduce the risk of directly employing forced labour or those who may be subject to human trafficking.

Where Carnell Group utilise labour only sub-contractors, the introduction of due diligence checks ensures that, as a minimum, labour providers comply with our commitment to the prevention of modern slavery and their processes for recruitment contain no illegal labour practices

Training

Carnell Group is committed to rolling out regular training on this policy statement as necessary and communicating out our zero-tolerance approach to our supply chain, both at the outset of our business relationship, and reinforced as appropriate thereafter. Carnell Group expects and requires the same standards from our supply chain and polices this requirement through a programme of supplier audits.

Carnell Group business activities during 2023/24 included:

- Continued review of processes and procedures to ensure that modern slavery and human trafficking is not taking place within the supply chain.
- Revision of our Ethical Sourcing Policy.
- Introduction of our Anti-Slavery and Human Trafficking Policy.
- Initiatives including employee Modern Slavery awareness training, supplier reviews and assessment and improved audit processes.
- Incorporation of Modern Slavery requirements into new and existing supplier review processes.
- Key personnel undertaking the CIPS Ethics Course which provides vital up to date information on modern slavery and areas of concern and risk.

Carnell Group business objectives for the financial year 2024/25 include:

- Continuing to monitor suppliers using a range of initiatives across our business including the monitoring of suppliers to cover both high and medium risk suppliers and looking at the supply chain to evidence our commitment to the prevention of Modern Slavery.
- Undertaking further supply chain reviews to ensure that any potential new or existing suppliers have not changed their status in terms of "risk".
- Continuing to engage with key strategic suppliers and industry bodies across the markets in which they operate to better understand capability, best practice and learning on Modern Slavery to continuously improve our approach to Modern Slavery.

Modern Slavery Statement

This statement will be subject to annual review and has been approved by the Carnell Group board. This policy has been endorsed by Carnell Group's Managing Director, Andrew Sharp and is reviewed and developed on an annual basis.

Signed: A handwritten signature in dark ink, appearing to read "Andrew Sharp", written in a cursive style.

Andrew Sharp - Managing Director

Date: 18/12/2025