



**CIVIL
CONNECT**
PLC

Modern Slavery Statement

September 2025

Introduction from our Director

At Civil Connect PLC, we are unequivocally committed to upholding the highest ethical standards in all aspects of our operations. Modern slavery is a heinous crime that violates fundamental human rights, and we have a zero-tolerance approach to any form of it within our business and our supply chains. This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, outlines the steps we have taken during the financial year to ensure that slavery and human trafficking are not taking place in any part of our business or our associated supply chains.

We believe in creating a transparent and responsible business environment. Our role in the civil engineering recruitment sector places us in a unique position to influence and ensure fair labour practices. We are dedicated to continuous improvement and will review our practices regularly to ensure they remain effective in combatting this global issue.

Ramon Bell

Chairperson of Civil Connect PLC

Our Organisation, Structure, and Supply Chains

Civil Connect PLC is a leading specialist recruitment agency for the civil engineering sector in the United Kingdom. We connect highly skilled professionals with temporary and permanent roles across a range of infrastructure projects. Our core business involves sourcing, vetting, and placing candidates.

Our supply chain is relatively simple and primarily includes:

- **Service Providers:** IT services, professional advisors (legal, accounting), marketing agencies, and office facility providers.
- **Sub-contractors and Umbrella Companies:** Organisations through which we pay temporary workers.
- **Clients:** We partner with a wide range of construction and civil engineering firms across the UK.

We are committed to working with suppliers and partners who share our ethical standards.

Our Policies in Relation to Slavery and Human Trafficking

We have a robust framework of policies that reflect our commitment to acting ethically and with integrity in all our business relationships. Key policies include:

- **Whistleblowing Policy:** We encourage all employees, workers, and other business partners to report any concerns related to our direct activities or supply chains. Our policy ensures that whistleblowers are protected from any detrimental treatment.
- **Employee Code of Conduct:** Our code of conduct makes it clear to employees the actions and behaviour expected of them when representing the company. We strive to maintain the highest standards of employee conduct and ethical behaviour.
- **Supplier Code of Conduct:** We are committed to ensuring our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions and treat workers with dignity and respect.
- **Recruitment & Vetting Policy:** Our own recruitment and candidate vetting procedures include stringent checks on identity, right-to-work, and bank account verification to prevent illegal working and identify potential signs of exploitation.

Due Diligence & Risk Assessment

As part of our initiative to identify and mitigate risk, we have in place systems to identify, assess, and monitor potential risk areas in our supply chains. We conduct due diligence on all our suppliers and partners, particularly those providing labour (such as umbrella companies), requiring them to confirm their compliance with the Modern Slavery Act 2015.

We recognise that the highest risk of modern slavery in our business lies within the supply of temporary labour. We mitigate this risk through rigorous checks, including:

- **Right to Work Checks:** Verifying that all workers have the legal right to work in the UK.
- **Identity Verification:** Ensuring the person presenting for work is the person they claim to be.
- **Payment Procedures:** Ensuring that all workers are paid directly into a personal bank account in their name.
- **Supplier Audits:** Conducting regular checks on our payroll partners to ensure compliance with legislation and ethical standards.

We will not work with any organisation that we suspect is involved in modern slavery in any form.

Training and Awareness Building

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. This includes:

- How to spot the signs of modern slavery and trafficking.
- What steps to take if they suspect a case of modern slavery.
- The importance of our policies and due diligence processes.

This training is mandatory for all new starters and is refreshed annually for all employees.

Measuring Our Effectiveness

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion rates of staff training on modern slavery.
- The number of supplier audits conducted.
- The number of reports received through our whistleblowing channels.
- Actions taken to strengthen supply chain auditing and verification.

Statement Approval

This statement has been approved by the Board of Directors of Civil Connect PLC, who will review and update it annually.

Ramon Bell

Chairperson

Date: 22nd September 2025



Civil Connect PLC

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