

The CET Group of Companies
Modern Slavery Act 2015 – Group Statement FY 2019-20

The CET Group of Companies are pleased to report a turnover in excess of £36 Million for the financial year 1st April 2018 to 31st March 2019. The following statement fulfills the Group's legal requirement to produce a Modern Slavery Statement in compliance with the requirements of the Modern Slavery Act 2015.

The CET Group of Companies, our Business Streams and Supply Chain

CET Structures Property Assurance Division provide a claims fulfilment service for the insurance industry covering home emergency, drainage & underground services and property repairs from our Service Centre in Castle Donington. We process insurance claims for our clients and appoint skilled and competent directly employed staff and suppliers from our approved network to carry out surveying and repair works on behalf of our client's customers at their property.

We also provide Subsidence Investigation Surveys throughout the United Kingdom supported by UKAS accredited soils testing at our laboratory in Essex for our insurance clients through our **SI Division**.

Our supply chain for such activities is typically qualified and experienced SME's or sole traders, registered and operating within the United Kingdom.

Our Infrastructure businesses, **Construction Testing Solutions** and **CET Infrastructure** operate a number of UKAS accredited construction materials testing laboratories throughout the United Kingdom, covering a wide range of laboratory and on site testing and inspection activities for our construction and civil engineering clients.

In addition, we also provide specialist geotechnical and environmental consultancy services and a wide range of structural investigation services for our civil engineering and property clients throughout the United Kingdom.

The final member of our Infrastructure business **Calibration Testing Solutions**, operate a UKAS accredited calibration laboratory in Chesterfield offering a range of laboratory based and on site dimensional, electrical, force and pressure equipment calibration services for clients throughout the United Kingdom.

Our supply chain for these activities typically falls into two categories;

- Suppliers - equipment manufacturers and suppliers registered and operating within the United Kingdom, with the necessary experience, skills and qualifications to provide us with laboratory and site testing equipment that comply with British and European test standards.
- Subcontractors – such as UKAS accredited laboratories that can provide services that we do not hold accreditation for ourselves or individuals or organisations that provide specialist services that support our work on site for our clients.

Our **Head Office** is based in Castle Donington and is home for central support functions including Corporate Governance, Human Relations, HSEQ, Finance and IT departments.

Supply chains engaged to support central services are typically UK based and registered organisations providing support functions and facilities, such as technology, professional and standard operating systems support to assist the company in day to day operational management.

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Our Policies, Procedures and Due Diligence Processes Related to Slavery and Human Trafficking

Our Employees;

The CET Group of Companies currently employs over 500 directly employed and temporary personnel, operating from 14 different office and laboratory locations throughout the United Kingdom. Our HR department follows robust documented HR recruitment procedures, that include checks to verify;

- That all of our employees provide ID that is checked to be genuine,
- That all of our employees are eligible to work in the UK
- Previous employment history checks, and
- Previous employment and personal reference checks.

All of our employees enter into a contract of employment which they are free to terminate following the appropriate notice periods as defined in the contract.

Our HR processes are supported by a number of documented business assurance and corporate governance policies and procedures that assist us in getting to know and keeping in touch with our staff and promoting a culture of wellbeing, openness, support and responsibility including;

- Anti-Bribery and Corruption Policy
- Anti-Fraud Policy
- Whistleblowing Policy
- Corporate Social Responsibility Programmes
- Employee Confidentiality Agreement and Data Protection Contract
- Mental health wellbeing training, campaigns and promotions

Our Supply Chain;

We manage and maintain an appointed network of subcontractor and supplier organisations required to support the delivery of our trading activities.

Our supply chain can be identified under four main categories;

1. Insurance claims fulfilment contractors. This includes sole trader or SME's that we utilise to complete insurance claims fulfilment activities at the customer's property.
2. Support Contractors which include civil engineering contractors and testing laboratories that support us in those construction materials and calibration activities or support services that we do not have competence to carry out or hold accreditation for.
3. Business to Business services such as recruitment consultancy, marketing and events, IT and telecommunications, travel, car fleet, consultancy and other professional services.
4. Operational services - all other procurement of goods and services (e.g. Personal Protective Equipment, cleaning, catering, stationery, maintenance of the CET Group of Companies offices etc.

Each organisation completes an evaluation and approval process prior to being appointed as an approved subcontractor or supplier.

The depth and extent of our evaluation is scaled, to reflect the risks to the CET Group of Companies from association to the supplier or subcontractor and the practical, contractual and regulatory requirements related to the services they provide for us.

Upon completion of the evaluation process each organisation in categories 1 & 2 also sign up to work in accordance with our Code of Conduct.

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Our Risks around Slavery and Human Trafficking

We believe that the processes we employ for recruitment, management and development of our employees are robust, legally compliant and relevant to minimise our risks of failing to recognise or manage our duties related to slavery and human trafficking.

We recognise the checks and balances that we currently operate within our supply chain however, have not specifically addressed slavery and human trafficking and, while we are confident that our tier 1 supply chain presents little risk in this respect, we have no means of demonstrating positive confirmation of this.

Additionally we have yet to review supplementary tiers within our supply chain to establish whether there is a reasonable risk of slavery and human trafficking throughout our full supply chain.

Training our staff to recognise and prevent Slavery and Human Trafficking

We have previously posted promotional items to highlight how modern slavery and human trafficking infiltrates its way into society and could possibly be affecting our own employees. We have obtained other publications, leaflets and instructional videos from the Home Office and the Gangmasters and Labour Abuse Authority that we can now distribute to our directly employed staff and supply chain.

KPI's and Looking Ahead to Financial Year 2019-20

The CET Group of Companies has undertaken a commitment over the next 12 months to continue to develop and implement robust policies, procedures and activities to combat slavery and human trafficking within our business and supply chain. Our objectives and commitments include;

1. To monitor, through internal audit, the implementation of our staff recruitment and management policies and procedures to ensure our standards are being maintained and that we remain compliant with all legal, statutory and customer requirements.
2. To review our Supplier Evaluation and Approval process and make any necessary amendments to verify with our suppliers their compliance with the Act or to provide details of their approach to modern slavery, establishing any risks from the whole supply chain.
3. To train our supply chain managers and administration staff in Modern Slavery, to enable them to be effective recruiters and provide them with the skills required to monitor changes within our supply chain and the external environment to update our approach accordingly and to ensure that the risk within our supply chain remains low.
4. To provide our senior management team, operational managers and supervisors training in Modern Slavery through our online training platform to enable them to recognise the types of modern slavery and how slavery and human trafficking can directly affect our business.
5. To communicate to all employees the CET Group of Companies position and approach to the Act through our CET News platform, managed by our in-house Marketing and Communications Executive,
6. To provide our directly employed staff awareness and training utilising resources obtained from the Home Office and the Gangmasters and Labour Abuse Authority.
7. To promote our Whistleblowing Policy and provide staff with a means of confidentially speaking up if they suspect that they, or their colleagues, may be subject to abuse of the act.
8. To continue to build upon the excellent work promoting mental health led by the senior management team, recognising that mental wellbeing, as well as physical safety are critical to eliminating exploitation, removing threats and abuse.
9. Supporting our Mental Health First Aiders and Champions through regular meetings and updates.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and constitutes the CET Group of Companies slavery and human trafficking statement for the financial year ended 31 March 2020.

Chief Executive Officer

Date: 12th July 2019



Peter Eglinton