

# carpenters group

## Modern Slavery Statement 2026

Version: 12  
Last Reviewed: Jan 2026  
Owner: Holly Houghton  
Dept: Risk & Compliance  
Audience: Public

### Introduction

This statement sets out the actions of Carpenters Limited, Carpenters Insurance Services Limited and Carpenters Scotland Limited ("Carpenters") to understand all potential modern slavery 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 supply chains. This statement is reviewed on an annual basis unless otherwise required under legislative changes.

As a business operating in the UK, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. Due to the nature of our business activities, we believe that there is a very low risk in this area. However, we are aware of our obligations and have given due consideration to them. The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking,

## Organisational structure and supply chains

This statement covers the activities of Carpenters in relation to its recruitment, working practices and those suppliers who support the function of our business.

Our business solely operates in the UK; however, we consider employees who may originate from other countries around the world but only on the basis of their having genuine documentation to allow them to join our workforce and with their own free will.

We recognise that there are countries that may be of higher risk in this area.

As an employer, we do not undertake any business activities that may be considered to be of a high-risk nature to potential suppliers who may be in breach of this legislation.

We have the following policies in the following areas to support our actions:

- **Whistleblowing Policy**  
Any member of the firm can report their concerns in this or any other ethical or compliance issue with a guarantee of anonymity and that any such concerns will be taken seriously.
- **Compliance Policy**  
This sets out how we comply with our Professional Code of Conduct and appropriate obligations under Government legislation.
- **Employee Handbook**  
The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation.

## Procurement

The organisation 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, 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. The firm undertakes due diligence prior to and during any supplier contracts being in operation;

## Recruitment & Selection.

The organisation 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.

## Policy Implementation

### Training and awareness

Training is provided to all staff on induction with relevant policies available through our company Intranet. Guidance and support is available from our Risk and Compliance and HR Departments.

### Key Performance Indicators (KPIs) and Reporting

We consider our process sufficient if no reports of slavery or human trafficking, or practices indicative thereof, have been received from our staff, supply chain or other sources.

### Policy Review

This policy is subject to annual review; unplanned reviews may take place following significant changes or breaches.

### Board Approval

This statement has been approved by Donna Richards, CEO.

Signed: *DM Richards* Dated: 22 January 2026

### Version control

V#	Date	Author	Change Description	Approved By
1.0	2015	MRO	Creation	MRO
2.0	2016	MRO	Review	MRO
3.0	2017	MRO	Review	MRO
4.0	2018	MRO	Updated annual review	MRO
5.0	2019	MRO	Annual review	MRO
6.0	2020	MRO	Annual review	MRO
7.0	2021	MRO	Annual review	MRO
8.0	2022	MRO	Owner update	MRO
9.0	2023	MRO	Updated for 2023	MRO
10.0	2024	ROG	2024 review	HH
11.0	2025	HPH	Annual Review – inclusion of training, KPIs and Board Approval.	HPH
12.0	2026	HPH	Annual Review	DMR