



CCS Group Limited and its subsidiaries, Cleshar, ITS and GPX, are totally opposed to slavery and human trafficking in any form and, to this end, it is the policy of the Group that we are committed to acting ethically and with integrity in all of our business dealings and relationships. We further ensure the implementation of robust controls in order to provide the Board with assurance that slavery or human trafficking does not occur either within our business or in our supply chain.

The requirements of this policy apply to the group workforce. We further requires that all organisations that it contracts with have, as a minimum, an equivalent commitment to ensuring the absence of slavery or human trafficking in all aspects of their dealings with the Group.

The requirement for this policy arises from the Modern Slavery Act 2015 (the Act) which defines modern slavery as occurring in various forms including:

- Servitude
- Forced or compulsory labour
- Human trafficking
- 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

All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The requirements of this policy are communicated to all of those affected by it through various mechanisms including the intranet, emails, Toolbox Talks, briefings, etc.

All of the group's activities are subject to a programme of audits, inspections and observations aimed at assuring the ongoing effective implementation of its policies. Any issues identified as requiring remedial action are assigned to those persons best placed to rectify them and actions are monitored through to completion.

Should the Group identify any issue of concern, in contravention of the Act, then it will bring such instances to the attention of the Head of HR who will notify they appropriate authorities and will work with such authorities to ensure the most timely and effective resolution of such issues.

This policy is subject, as a minimum, to annual review to ensure that it continues to reflect the absolute commitment of the CCS Board to the opposing of slavery or human trafficking in any form. To this end, the Board asks everyone to engage with this policy in ensuring the achievement of this goal.

We are currently engaging with TfL on setting out a comprehensive statement on our website.

Michael Hesnan
Joint Managing Director

Andy Redican
Joint Managing Director