



Modern Slavery Act Statement

This statement outlines how the R G Carter Group ('the Firm') fulfils its obligations under the Modern Slavery Act 2015.

We are a construction company based solely in the United Kingdom. Our head office is in Drayton, Norwich, with regional offices located across East Anglia.

We are committed to act ethically, with integrity and transparency in all our business dealings and to implement effective systems and procedures to, as far as practically possible, ensure that slavery and human trafficking does not take place within our business or supply chain.

The Firm has a zero tolerance to this issue and likewise expects our people, suppliers and subcontractors to have the same. We all have a duty to be alert to the risks in our business and the wider supply chain. Staff are expected to report concerns that they have to their respective Managers, who in turn are required to act if concerns are raised.

Our Policies

We have a Modern Slavery Policy which 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 other policies to help combat modern slavery including our Public Interest Disclosure Policy (Whistleblowing).

Our Supply Chain

As is common in the construction sector, we have a large and complex supply chain, due to the nature of our operations and sectors within which we operate. We work with suppliers that provide supply and installation, raw materials, finished goods, labour only providers, employment agencies, consultants and specialist advisors.

All suppliers, regardless of spend, are vetted and we collect relevant evidence from all suppliers related to employment policies and modern slavery.

When sourcing materials, we evaluate sourcing opportunities with reference to ethics, sustainability and location where at all possible. Where materials are specified by clients, we work collaboratively to influence their choices including selecting sustainable and ethically sourced/produced materials.

Assessing Risk

We have systems in place to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

Where this risk cannot be reduced to an acceptable level we will, where possible, source alternatives that meet our ethical and sustainability aims. By working with long established supply chain partners, we have developed collaborative relationships that enable us to challenge and work together to achieve these aims.

Awareness and training

We proactively promote awareness, via all colleagues and supply chain partners and reporting of any suspected incidents, of modern slavery, unfair treatment or coercion either within our businesses or within our supply chain.

Steps we have taken

We have taken the following steps to ensure that modern slavery and human trafficking does not feature in our supply chains or our business. We:

- include protocols during our recruitment process which are designed to ensure that modern slavery does not feature in our business;
- use MRZ checking software to check the validity of identity documents as part of our recruitment processes;
- provide materials to staff and those working on site during our induction processes including posters and support material and confidential reporting/support at all locations;
- have resources in relation to modern slavery (including induction materials, posters and toolbox talks/training sessions) available on the intranet, Construct, for all colleagues to access at any time.

In addition, we will continue to:

- periodically analyse our supply chain and engage with our suppliers in relation to our aims and compliance with our modern slavery requirements;
- implement Construction Line Gold standards for our suppliers. This sets out higher standards for environmental, social sustainability and modern slavery vigilance. Construction Line manages the process and reporting of completion and compliance;
- be members of Stronger Together to support our aims;
- be members of the GLAA Construction Protocol;
- use GLAA active license checks on labour only employment agencies;
- achieve a green rating on the Crown Commercial Modern Slavery Assessment Tool (MSAT).

Effectiveness

We have had no suspected or actual incidents of modern slavery reported directly to us this year.

Further steps

We plan to build on work already carried out by taking the following steps:

- Continue to mandate modern slavery e-learning, with a target of 100% of our colleagues that procure and manage labour and sub-contractors.
- Continue to reinforce of our expectations in relation to right to work and responsible recruitment practices through our supply chain, including Construction Line Gold certification to all key members of the supply chain.
- Continue to deliver toolbox talks/training sessions at all locations on the identification and prevention of human trafficking and modern slavery.

Accountability

The Group Company Secretary is accountable to the Board and responsible for overseeing compliance with the Modern Slavery Act and annual preparation of the Modern Slavery Act statement.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery statement for the financial year ending 31st December 2024. This statement is made on behalf all R G Carter companies, including:

1. R G Carter Construction Limited
2. R G Carter Cambridge Limited
3. R G Carter Limited
4. R G Carter Lincoln Limited
5. R G Carter Projects Limited
6. R G Carter Southern Limited
7. The Eyre Group Limited
8. Drayton Windows Limited

Signed:

A handwritten signature in black ink, appearing to be 'J Moynihan', with a long horizontal line extending to the right.

J Moynihan
Director of HR and Business Systems

Review Date: 1 January 2026