

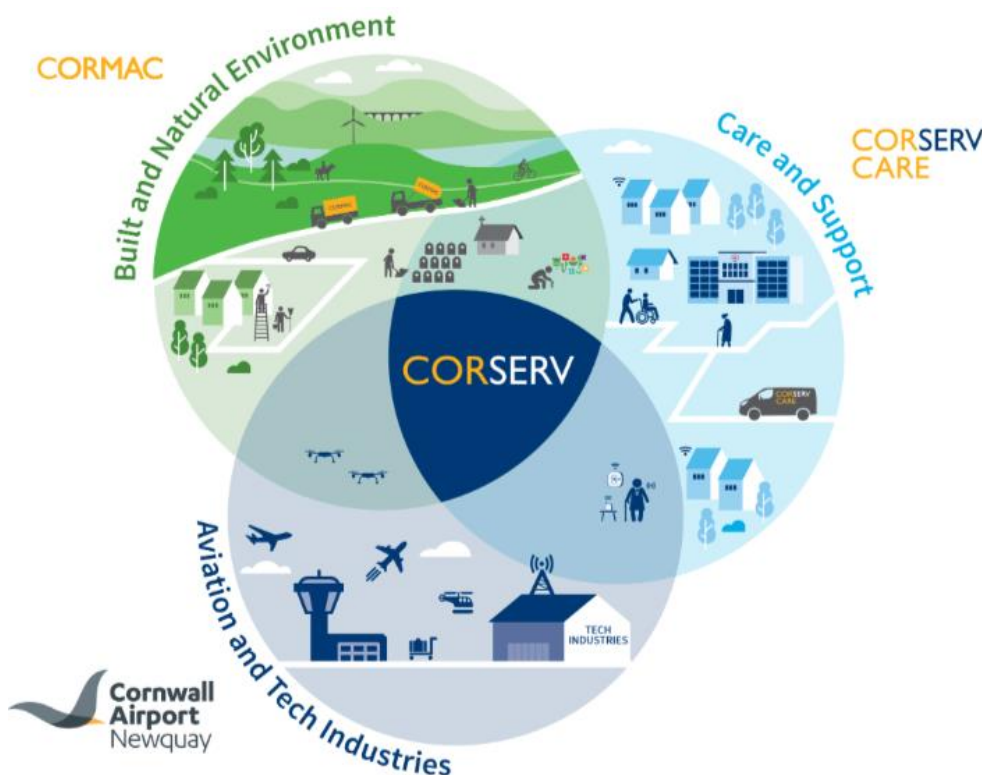


CORSERV LIMITED

Modern Slavery and human trafficking statement for the CORSERV Group of Companies (financial year 2024/25)

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and outlines the steps that the CORSERV Group has taken over the 2024/25 financial year to ensure that slavery and human trafficking are not taking place within the Group or its supply chain. This statement covers the financial period from 1 April 2024 to 31 March 2025 and covers CORSERV Limited, CORSERV Solutions Limited, CORSERV Facilities Limited, Cormac Contracting Limited and Cornwall Airport Limited.

The CORSERV Group



CORSERV, wholly owned by Cornwall Council, exists to improve the lives of people in our communities. We provide a diverse portfolio of services including infrastructure, engineering, environmental services, construction, facilities/property management, social care, Newquay Airport operations and recruitment services to Cornwall and beyond. Our Corserv Support division provides human resources, procurement, finance, IT and legal and governance services to our service divisions. We deliver key services to Cornwall, support the local economy and return profits to the Council as our Shareholder. We employ approximately 2,200 people across the Group.

For the financial year 2024/25, the CORSERV Group of Companies included CORSERV Limited, CORSERV Solutions Limited, Cormac Contracting Limited (a subsidiary of





CORSEV Solutions Limited), Cornwall Airport Limited, CORSEV Facilities Limited, and CORSEV Care Limited (the "CORSEV Group of Companies").

Our approach to modern slavery and human trafficking

We operate a zero-tolerance approach to modern slavery and human trafficking. We expect all of our Directors, Officers, employees, suppliers, contractors, our supply chain and any other third-party we engage, to adhere to and comply with our zero-tolerance policy.

We understand the importance of ensuring that robust systems are in place to identify and address any risks of modern slavery and/or human trafficking. We ensure that procedures are in place to identify, and where necessary, address such risks. This statement sets out the measures that we have taken to address modern slavery and human trafficking in the higher risk areas of our organisation.

➤ Recruitment and Employment

We have employment practices, procedures and diversity policies in place to help ensure the fair recruitment and treatment of employees. Our recruitment policies are designed to ensure that all prospective employees have the right to work in the UK and to safeguard employees from coercion. We are committed to paying fair wages and all staff are paid the Real Living Wage as a minimum. This commitment is shared with our Shareholder, who is an accredited Living Wage employer.

Prior to starting employment with us, we will verify and obtain evidence that a new employee has the right to work in the UK. Where there are additional requirements for employment (for example a Disclosure and Barring Service (DBS) check) then further forms of identification will be obtained and verified before employment commences.

Use of agency staff may be arranged through external recruitment agencies. Before any agency staff are engaged, we would require assurance that the individual has the right to work in the UK. Where the relevant employment checks cannot give the level of assurance required to our satisfaction, an individual would not be invited to undertake work in an agency capacity.

We continue to review our contractual relationships with the external recruitment agencies we engage. During the 2023/24 financial year, we have made our agency on-boarding process more robust through the introduction of additional governance through a preferred suppliers list. We are developing a master vendor solution and continue to ask the recruitment agencies to provide evidence of compliance with the Modern Slavery Act 2015, where required.

CORSEV also operates its own internal recruitment service both within its Group of Companies and for external businesses (Jobline) as well as an external apprentice service. Right to work in the UK is verified as part of standard candidate checks.

➤ Service Delivery





In order to deliver our services, for example social care and residential property maintenance, our staff are often required to visit residents in their homes. Our staff may witness, become aware of or suspect modern slavery, human trafficking, abuse and/or coercion when delivering our services. It is crucial that our staff are able to identify potential occurrences of modern slavery, human trafficking and other safeguarding issues and understand how to report these concerns without delay so that appropriate action can be taken. We have policies in place (such as our Speaking Up policy and Safeguarding policy) as well as an e-learning programme to provide guidance to our staff on how to identify and report these issues. These policies are reviewed annually.

➤ Procurement and Supply Chains

We spend approximately £130 million annually on goods, services, and works. Our supply chain is diverse and includes agency staff, professional services, construction materials, software, fleet vehicles, PPE and workwear, office equipment, and cleaning products. We are committed to ensuring that our procurement practices are ethical, sustainable, and aligned with our zero-tolerance approach to modern slavery and human trafficking.

To uphold these values, we have implemented a robust procurement strategy that supports ethical operations, contributes to the local economy, and promotes sustainability. Our approach includes the following key measures:

- **Supplier Expectations:** We require all subcontractors, suppliers, and consultants to take proactive steps to prevent modern slavery and human trafficking within their operations and supply chains. This expectation is embedded in our tendering processes and contractual agreements.
- **Contractual Safeguards:** All contracts include clauses mandating compliance with modern slavery legislation and our internal policies. We reserve the right to terminate contracts where a supplier is found to be in breach of these obligations.
- **Due Diligence:** Prior to entering into contractual relationships, we conduct appropriate due diligence to assess the risk of modern slavery and ensure suppliers meet our ethical standards.
- **Risk-Based Questionnaires:** In 2024/25, we introduced a supplier questionnaire for higher-risk procurements—particularly where goods may be sourced from outside the UK or where there is a high labour requirement. This tool helps us assess how suppliers manage modern slavery risks within their own operations and supply chains.
- **Legal Compliance:** We require suppliers that are legally obligated to publish a Modern Slavery Statement to confirm their compliance with Section 54 of the Modern Slavery Act 2015. Any concerns identified during this process prompt a review of our ongoing relationship with the supplier.
- **Fair Payment Practices:** We aim to pay all valid and undisputed invoices within 30 days. Corserv Solutions Limited and Cormac Contracting Limited have been awarded 'Bronze' status under the Fair Payment Code by the Government's small business commissioner. Timely payments help reduce financial pressures on suppliers, which can otherwise increase the risk of worker exploitation.





- **Fair Wages:** We expect our suppliers to pay their staff fairly. Contracts include a requirement that all personnel delivering services to CORSERV are paid, at minimum, the Foundation Living Wage. Where concerns arise regarding compliance, we seek assurances from the supplier and may reconsider the relationship if satisfactory evidence is not provided.

➤ Training

In the 2024/2025 year we have reviewed our e-learning programme and Learning Management System. This work has included a review of modern slavery e-learning. This work is ongoing into the 2025/2026 financial year.

In August 2025 we are introducing a core mandatory e-learning programme to our staff on how to identify modern slavery and human trafficking issues and how they can report any concerns (via our Speaking Up policy).

We have safeguarding advocates who have received specialist safeguarding training to help identify any risks which could amount to modern slavery and/or human trafficking.

➤ Policies

We have implemented a number of corporate policies which are designed to identify and address modern slavery and human trafficking issues. These policies include Speaking Up (Whistleblowing), Modern Slavery, Anti-bribery, Corruption and Fraud, Supplier Code of Conduct, Safeguarding and DBS. All of our policies are annually reviewed and updated where necessary.

In the 2024/2025 financial year, we updated our procurement policy to reflect our sustainable procurement strategy and to reaffirm our zero-tolerance policy to modern slavery and human trafficking.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or supply chains. Our Speaking Up policy provides a mechanism for our employees to report suspected breaches of these policies in confidence.

➤ Governance, Effectiveness and Review

The detection of any modern slavery issues falls into the remit of ARAC's operations and is discussed on a regular basis. The ARAC are responsible for reviewing the modern slavery statement and policy annually.

Modern slavery and human trafficking issues would be identified as part of our annual internal audit programme, the findings of which are overseen and scrutinised by the Audit, Risk and Assurance Committee (ARAC).





We will continue to review the effectiveness of our internal audit programme and adopt policies and procedures where required.

Further steps

For the financial year 2025/26 and beyond we intend to take further steps to combat modern slavery and human trafficking in our supply chains. These steps include:

- Continuing to review and update our key policies, including Speaking Up (Whistleblowing), Modern Slavery and Safeguarding on an annual basis and seeking Board approval;
- Continue to refine and enhance our core mandatory e-learning training programme around our key policies including the introduction of an enhanced Learning Management System to support e-learning; and
- Develop reporting metrics to increase our assurance that modern slavery and human trafficking issues are being sufficiently monitored throughout our business.

A handwritten signature in blue ink, appearing to read 'Jan Ward'.

Jan Ward
Chairperson
For and on behalf of the Board of Directors of CORSERV Limited
Approved by the CORSERV Board on

