Modern Slavery Annual Statement

Introduction

Under the Modern Slavery Act 2015, Section 54, there is a requirement for companies above a certain annual revenue to produce a modern slavery statement that outlines what steps are being taken to prevent modern slavery.

CCS Group Limited Policy

The CCS Group Limited has an Anti-Slavery and Human Trafficking Policy. This sets the strategy for operations and support functions to meet the requirements of the Act and, most importantly, ensure the organisation is acting ethically and with integrity in its dealings with the workforce.

The Policy is subject to annual review and is updated as necessary to accommodate aspects such as changes to legislation, client requirements and Group organisation. The current policy was reviewed and signed off by the directors in July 2025.

Structure and Supply Chains

The CCS Group Limited has several operating companies. Cleshar Contract Services Limited and GPX Engineering Limited undertake works in the rail and construction environment; Infrastructure Training Services Limited provides rail-based training in-house and externally.

The Group has a combination of means by which people are engaged to work with the organisation. This may be directly or via subcontract organisations. There are measures in place to address the issues of modern slavery tailored to these, based on risk assessments undertaken.

The Group also uses suppliers for materials, products, and equipment. The Group Guidance also includes risk and mitigation measures to address these types of businesses, especially when based outside the UK. Work continues on the supply with a supplier charter and questionnaire being complete by suppliers and reviewed by finance, commercial and HSQE before onboarding. Work on the ongoing evaluation of the subcontract element of the supply chain will continue.

Due Diligence

The CCS Group Limited remains committed to improving our practices to combat slavery and human trafficking as set out in our Policy.

The creation of the CCS Guidance on modern slavery formalises the framework through which the business will continue to develop robust processes to combat the issues of modern slavery.

As part of the continual improvement of the business an action plan has been raised to identified key topics for further development. This will also be kept under review and updated and re-issued to key staff to maintain the momentum on continual improvement. This will be led by the HR department. The action plan has been reviewed and updated to highlight progress on the items raised and also other areas to be developed going forward.

Regular reporting on modern slavery issues to the Board will be carried out by HR, utilising the KPIs established as part of the HR reporting dashboard.

The CCS Group Limited has continued the registration with the Modern Slavery Statement Register.

Risk Assessment and Mitigation

As noted above the Group has undertaken risk assessments based upon potential risks to our workforce. These are included within the CCS Guidance document.

As importantly, the assessments are supported by the mitigation measures that are there to eliminate or minimise the risks identified. The risk schedule also highlights specific aspects of the environment within which we operate as these are important factors in how these issues are addressed, especially around aspects skills and training of operatives.

Measuring Effectiveness

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We have developed a range of key performance indicators (KPIs) to assist in reviewing and measuring Group performance on modern slavery issues. The action plan includes information on the KPIs.

The KPIs are held on a separate schedule, supporting the CCS Guidance document. The schedule is divided into two separate parts. The first part are KPIs in relation to activities to be implemented to improve the management of slavery and human trafficking. The second part contains a range of reporting KPIs that will be used to monitor ongoing performance. These will be included in the HR dashboard for Board review.

Training

Training and briefing of staff and the workforce are important to maintain awareness of the issues. Briefing information has been developed for staff and the workforce including a short presentation and toolbox talk information so that the messages from the policy can be delivered widely across the organisation. The programme of briefings and toolbox talks has been implemented and will continue to maintain awareness on modern slavery issues.

A review of the specific training required for key staff is to be undertaken as part of the development of the processes, under the current action plan.

Annual Statement Approval

This annual statement has been reviewed and approved by the Board of the CCS Group Limited.

Michael Hesnan

Joint Managing Director

Andy Redican

Joint Managing Director