

# **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**



## **Introduction**

CMAC Group are committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and we will continue to review and seek to improve our practices to combat each of these issues.

## **Structure of the organisation**

The CMAC Group is comprised of a number of companies, including CMAC Group Limited, and provides transport services in the UK and overseas.

CMAC Group provide a managed ground transport and accommodation solution to a wide variety of organisations, including clients in the travel, airline, rail, business continuity and events and conference sectors. To do this, CMAC Group accesses a nationwide network of approved transport and accommodation suppliers. Further information about the nature of our business can be found on our website at <https://www.cmacgroup.com>.

## **Policies, Procedures and Training**

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Modern Slavery Policy
- Labour Standards Policy
- Anti-Harassment and Bullying Policy
- Equal Opportunities Policy
- Corporate and Social Responsibility Policy
- Whistleblowing Policy

All employees are made aware of these policies and are required to abide by them.

This supplements the commitment we make towards labour standards when we induct new employees into the business. New employees are required to undertake online training in respect of modern slavery to provide knowledge on how to identify, acknowledge and report any modern slavery in and around the workplace or our supply chain. We make employees aware that they are entitled to have 'dignity at work' and we advise them of our grievance procedure if they have concerns about matters such as their workload, working conditions or bullying. Our Whistleblowing Policy confirms what individuals should do if they suspect wrongdoing or dangers in relation to our activities.

We have achieved a silver accreditation by Investors in People ("IIP").

## **Our Due Diligence Processes**

We undertake due diligence on our suppliers and make sure they are aware of our zero-tolerance position on this issue as well as our expectations of them.



As part of the supplier onboarding process, we conduct an initial audit which specifically addresses the measures and procedures the supplier has in place to ensure that slavery and human trafficking is not taking place in their business or supply chain. This enables us to identify and manage any vulnerabilities. We ensure suppliers are aware that we are committed to preventing acts of modern slavery and human trafficking from occurring within our supply chain. We highlight modern slavery and human trafficking issues to our suppliers, refer them to our modern slavery statement and signpost them to information and training resources.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

In addition, our Modern Slavery Policy sets out what slavery/ servitude and trafficking are and what our employees should do if they suspect this in our supply chain.

Agreements with our suppliers in Europe (outside UK) incorporate modern slavery and audit compliance obligations for our suppliers, which reflect the commitment expressed in this statement.

## **Risk and Compliance**

It is unlikely that any of our employees could become a victim of modern slavery - officers, managers and employees are well aware of our policies and procedures and any suspected breach would be treated seriously, dealt with promptly and thoroughly investigated. Our modern slavery policy advises managers to be aware of, and recognise, the signs of ill treatment as well as what to do, should such behaviour be suspected. Our employees are located within UK, Spain, Portugal, Greece and the Netherlands, which all have a low prevalence of modern slavery and a high government commitment to eradicating modern slavery.

With regards to our suppliers, having considered both the Global Slavery Index and the United Nations Office of Drugs and Crime website, we do not consider that we operate in high-risk sectors or locations. If we were to ever discover that slavery or trafficking were occurring either by consent, connivance or neglect on the part of the supplier then we would immediately seek to terminate our relationship with them.

## **Planning for the future**

Following a review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to continue to undertake due diligence of our supply chain and, monitor and work with our supply chain (with a focus on our accommodation providers), to tackle slavery and human trafficking.



Agreements with our transport solution providers in the UK will be updated shortly to incorporate requirements of our suppliers which reflect the commitment expressed in this statement and will place modern slavery and audit compliance obligations on our suppliers.

We will continue to invest time and resources in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programme, all employees will understand how to identify and report any concerns.

We will shortly implement an internal modern slavery risk assessment, which will be reviewed at least annually, and use Key Performance Indicators (KPIs) to facilitate regular benchmarking of our approach to managing the risk of modern slavery.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and is made on behalf of CMAC Group Limited of the subsidiaries set out below for the financial year ending 31 December 2022.

CMAC Group UK Limited (and its subsidiary CMAC Transport Limited);  
CMAC Cabfind Limited;  
CMAC Partnership Limited;  
CMAC Europe IKE;  
Ontraccs Ltd;  
CMAC International Limited (and its subsidiaries Aircinks Solutions SLU, ST Services Iberia SL, Here and Dare Unipessoal LDA; Transfer Services Consulting Ltd and Airport Facility Partners B.V.);  
Cabline National Holdings Limited (and its subsidiaries Cabline UK Limited and Coach and Bus Limited); and  
CMAC Investments Limited ( and its subsidiaries Paragus Limited and Coach Hire Comparison Limited).

**Signed:**

A handwritten signature in black ink, appearing to be 'DB' or similar, written over a light grey background.

**Name: David Barrow**

**Position: Chief Financial Officer**

**For and on behalf of CMAC Group Limited and its subsidiary companies**

**July 2023**