

## CORSERV LIMITED

### Modern Slavery and Human Trafficking Statement for the CORSERV Group of Companies (financial year 2025/26)

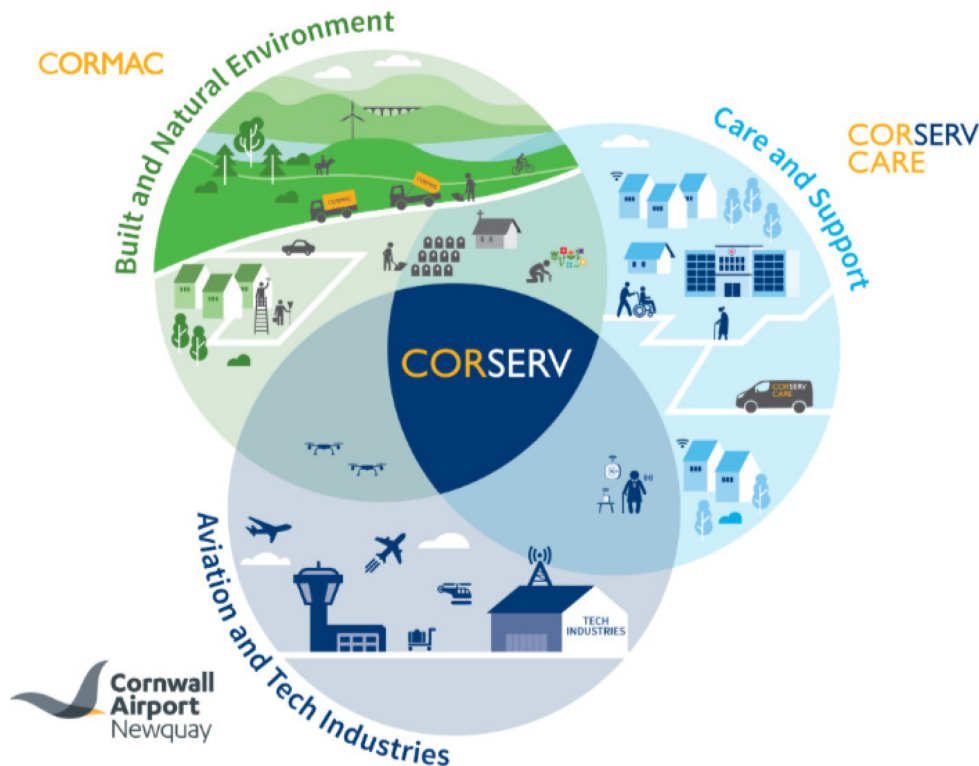
This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and outlines the steps that the Corserv Group has taken over the 2025/26 financial year to ensure that slavery and human trafficking are not taking place within the Group or its supply chain. This statement covers the financial period from 1 April 2025 to 31 March 2026 and covers Corserv Limited, Corserv Solutions Limited, Corserv Facilities Limited, Cormac Contracting Limited and Cornwall Airport Limited (the “Corserv Group of Companies”).

#### Introduction

It continues to be a priority for the Corserv Group to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

#### Section 1: About Corserv

##### The CORSERV Group structure



CORSERV, wholly owned by Cornwall Council, exists for one clear purpose: to improve the lives of people in our communities.



We provide a diverse range of services including infrastructure, engineering, environmental services, construction, facilities/property management, social care, Newquay Airport operations and recruitment services to Cornwall and beyond. Our ambition is to deliver high quality services that create lasting social, economic and environmental value and support the delivery of Cornwall Council's six strategic priorities. Our Corserv Support division provides human resources, procurement, finance, IT and legal and governance services to our service divisions.

We employ approximately 2,100 people across the Group and our social value, verified at £60m in 2024/25, which includes local employment, apprentices training and skills, volunteering, carbon reduction and biodiversity gains. This supports our ethos of being a responsible business.

We recognise that our key risk areas include construction, social care and agency labour. As an organisation we have implemented robust controls, which are regularly reviewed, to monitor and mitigate these key risks.

### **Procurement and supply chain**

We spend approximately £100 million annually on goods, services, and works across 92 formal contracts, and through ad hoc purchases. Approximately 70% of our annual spend is with the local supply chain, which demonstrates our commitment to supporting the local economy. Our supply chain consists of small business, SMEs and larger corporates operating regionally and nationally.

Given the scale of our supply chain, it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks. While we maintain oversight of our Tier 1 suppliers, we recognise that visibility beyond this level is more limited and continue to develop our approach in this area in order to gain a deeper understanding of our supply chain tiers.

Our supply chain is diverse and includes agency staff, professional services, specialist contractors, construction materials, software, vehicles, food, 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 either our internal policies or the equivalent policies operated by the organisations with which we contract. We reserve the right to terminate contracts where a supplier fails to inform us of either a potential or actual breach of these obligations. All contracts require suppliers to immediately notify Corserv if they suspect or become aware of any breaches within their supply chain. A failure to inform Corserv of a breach will result in the removal of that supplier from Corserv's supply chain.
- **Due Diligence:** Prior to entering into contractual relationships, we undertake proportionate, risk-based due diligence to assess the potential risk of modern slavery and to ensure that suppliers



operate in line with our ethical standards. This process includes the use of risk-based questionnaires and an assessment of key risk factors, such as the geographical areas in which the supplier operates, the nature of its workforce, and its business model. We also obtain and review relevant information from suppliers, including confirmation of whether they publish a Modern Slavery Statement and the extent of their existing policies and controls in this area.

- **Risk-Based Questionnaires:** For higher risk procurements, we require suppliers to complete a questionnaire as part of the procurement process. 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. We are pleased to confirm that our average supplier payment period over the last financial year was 25 days, showing our commitment to improving supply chain cashflow. 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 the Group 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.

## Recruitment and Employment

Across the organisation Corserv has approximately 2,100 employees, 60% of whom are frontline delivery staff. In line with the Corserv People Plan, 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 as soon as practicable before employment commences. In exceptional circumstances a DBS Risk Assessment will be completed where there are delays outside our control while full DBS checks are completed.

## Agency

In our 2024/2025 statement, we set out our intention to formalise our external recruitment agency arrangements. We have subsequently implemented a Master Vendor Solution, managed by our internal



agency, Jobline, throughout the business which helps provide assurance that our onboarding of external agency staff is robust and compliant.

Through the Master Vendor Solution, all suppliers have been scrutinised following a formal tender process. 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 have also completed a series of webinars for recruiting managers to ensure they are familiar with the rules of the new Master Vendor Solution arrangement which prevents the use of any non-authorised agencies.

Corserv also operates its own internal recruitment service both across the organisation and for external businesses (Jobline) as well as an external apprentice service. Corserv currently has 92 employees studying through apprenticeships. Right to work in the UK is verified as part of standard candidate checks.

## **Section 2: Modern Slavery Policies and Training**

### **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
- Procurement
- Code of Conduct
- Safeguarding

All of our policies are annually reviewed and updated where necessary. In line with the Corserv Governance Framework, our key corporate policies are approved annually by the Board of Directors.

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. We encourage suppliers and their workforce to raise concerns through appropriate escalation routes. This includes Corserv's reporting mechanisms where applicable.

### **Training**

With 60% of our employees being engaged in frontline service delivery we recognise that there is a risk that our employees may witness modern slavery, trafficking or coercion, particularly our care employees, who provide critical services to residents within their homes.

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.



In the latter part of 2025, we launched a new core mandatory e-learning programme to all of our staff. This programme includes a separate module on how employees can identify modern slavery and human trafficking issues and how they can report any concerns (via our Speaking Up policy).

Training uptake is monitored through our Learning Management System, providing oversight of compliance across the organisation. During 2025/26, 92% of employees completed modern slavery training. Remediation action is currently ongoing to ensure that 100% of staff complete this training.

Additionally, 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.

### **Section 3: Risk Assessments and Risk Management and Assurance Framework**

#### **Risk Assessments, Management and Assurance Framework**

We conduct modern slavery risk assessments across our operations and supply chains, supported by procurement data, supplier questionnaires and risk indicators. Due to the complexity of our supply chains, we do not have full transparency of our supply chain. We have adopted a risk-based approach in order to achieve greater supply chain visibility of potential modern slavery risks, by focusing on higher risk supply chain contracts.

#### **Incident reporting**

Potential incidents of modern slavery may be reported through our Speaking Up processes, contractually or to line management. Corserv promotes a culture of speaking up and both staff and suppliers are encouraged to report any incidents or suspicions of modern slavery.

If any instance of modern slavery or human trafficking is identified, we will act promptly to investigate and prioritise the safeguarding on any affected individuals. We will further work with relevant authorities and suppliers.

For the year ended 31 March 2026, there have been no instances or suspicions relating to modern slavery reported.

### **Section 4: Governance**

#### **Governance, Effectiveness and Review**

Review of our modern slavery internal controls falls into the remit of Corserv's Audit, Risk and Assurance Committee (ARAC) and is discussed on a regular basis. The ARAC is responsible for reviewing the modern slavery policy annually and the effectiveness of internal controls. Operational responsibility sits with the Head of Legal and Governance (oversight), the HR Director (people) and the Procurement Director (supply chain).

### **Section 5: Goals and Next Steps**

For the financial year 2026/27 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;



- Developing our approach to our core mandatory e-learning training programme by improving overall completion rates throughout the organisation;
- Further considering and review our approach and risk assessments, particularly regarding our Tier 2 suppliers. We will consider adopting tools such as the Modern Slavery Assessment Tool (MSAT) to help identify modern slavery risks on procurement tenders;
- Monitoring the implementation of our Master Vendor Solution to ensure that agency onboarding processes are aligned throughout the organisation;
- Carrying out audits on a sample of Corserv's highest risk and largest suppliers;
- Considering applying for 'Gold' status under the Fair Payment Code; and
- Enhancing our current training delivery by introducing workshops for frontline staff.



Jan Ward  
Chairperson  
For and on behalf of the Board of Directors of CORSERV Limited  
Approved by the CORSERV Board on 12<sup>th</sup> August 2026