

# MODERN SLAVERY POLICY STATEMENT

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Cawarden Co Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cawarden Co Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our Policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include:

- Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

## Our Suppliers

Cawarden Co Ltd operates a supplier policy and maintains a preferred supplier list. We conduct checks on all suppliers before allowing them to become a preferred supplier. These checks include an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery. Our antislavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us

- 1. They have taken steps to eradicate modern slavery within their business
- 2. They hold their own suppliers to account over modern slavery
- **3.** They pay their employees at least the national minimum wage / national living wage.
- 4. We will terminate the contract at any time should any instances of modern slavery come to light

### Training

We will regularly conduct awareness training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

### For and Behalf of the Board

W. Crooks, Company Director

July 2020