



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. SCOPE

- 11 This policy is applicable to all persons working for or on behalf of the Company in any capacity including employees, agency workers, agents and contractors.
- 12 This policy supersedes any previous policy, historical practices, local site agreements or arrangements. This policy does not form part of any employee's contract of employment and may be amended at any time.
- 13 If there is any discrepancy between this policy and the relevant legislation the legislation will prevail.
- 14 All information regarding the Modern Slavery and Human Trafficking Policy is available to all employees on the C247 app.

2. POLICY

The Company is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the organisation, or in any of its supply chains. The Company expects that its suppliers will hold themselves and their own suppliers to the same high standards. The Company is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

3. WHAT IS MODERN SLAVERY?

- 31 Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. Modern slavery would include:



- Individuals who are forced to work through mental or physical threat
- Individuals who have been dehumanised, treated as a commodity or bought or sold as property.
- Individuals who are physically constrained or has restrictions placed on his or her freedom.

32 The Company strictly prohibits the use of modern slavery and human trafficking in its operations and supply chain.

4 POLICY STATEMENT

4.1 Capricorn expects everyone working with or on behalf of the Company to support and uphold the following measures to safeguard against modern slavery:

411 The Company has a zero-tolerance approach to modern slavery in the organisation or its supply chains. The prevention, detection and reporting of modern slavery in any part of the organisation or supply chain is the responsibility of all those working for the Company or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.



- 42 The Company is committed to having a clear and transparent company statement, which is reviewed regularly and is communicated to the employees posted on the website, which sets out the steps taken to prevent modern slavery and trafficking and the effectiveness of those measures.
- 43 The Company is committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.
- 44 The Company is committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in its operations and supply chain.
- 45 As part of the contracting processes, the Company includes a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with the Company's Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- 46 The Company's recruitment procedures require employment and recruitment agencies and other third parties supplying workers to the organisation to comply with the Company's Code of Conduct. Suppliers engaging workers through a third party are also required to obtain third parties' agreement to adhere to the Code.

5 RAISING A CONCERN

- 5.1 It is understood that employees may, at one time or another, have concerns about what is happening at work. Generally, these concerns can be easily resolved. However, some concerns may be about alleged malpractice, serious breaches of Company policy, or breaches of relevant regulations that apply to our business.
- 5.2 This policy therefore provides a procedure to enable employees to raise concerns about actual or possible malpractice and other serious breaches at an early stage and to provide assurance to employees that any matters raised will be dealt with seriously, without fear of



reprisal and, where possible, confidentially. The purpose of this policy is to allow employees to raise concerns at an early stage so that problems can be identified and resolved quickly.

- 5.3 The Company is committed to operating its business within its established policies, codes of practice and guidelines, within current legislation and/or relevant regulations and to the highest standards of professional conduct. In order to operate effectively within these values, it is essential that employees feel able to raise concerns with the Company.
- 5.4 If an employee has a concern that Modern Slavery and/or Human Trafficking of any form may exist within the organisation or supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must report it. The concerns can be reported internally or externally using the following procedures:
- Inform your Line Manager.
 - Inform the Human Resources/ Compliance Department
- 5.5 Where possible, employees should put their concern in writing in order to outline the nature of the suspected malpractice. Alternatively, concerns can be raised verbally, but employees must make it clear that they are raising a concern under the Modern Slavery and Human Trafficking Policy, in order to avoid any misunderstanding about the nature and seriousness of the verbal communication.



- 5.6 When raising a concern under this policy, the employee must declare any personal interest they have in the matter.

6 EMPLOYEE PROTECTION

6.1 The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform the Human Resources Department immediately.

6.2 The Company will not tolerate harassment or victimisation of any employee who raises a concern under this policy, regardless of whether or not the concern proves to be well founded.

6.3 Employees should not be discouraged from raising concerns due to actual or possible pressure from other work colleagues, employees or management. Discouraging another employee to come forward with a concern, is a disciplinary offence and will be dealt with under the Disciplinary Procedure.

6.4 Employees are further protected by legislation against being dismissed or being subject to a detriment because they have raised a concern. If an employee believes that they have been subject to a detriment they should immediately inform the person investigating their concerns.

6.5 Employees are responsible for ensuring that they follow instructions from the Company regarding non-disclosure and confidentiality.

7 RAISING CONCERNS EXTERNALLY

7.1 The Company would normally prefer employees to raise concerns using the above procedure.

7.2 Employees may wish to seek advice before formally raising a concern externally and may contact Public Concerns at Work, a registered charity which advises on serious malpractice within the workplace.



They can be contacted on 020 7404 6609 (www.pcaw.co.uk).

7.3 Employees who wish to report potential issues should use the Modern Slavery Helpline on 0800 0121700.

8 VARIATIONS TO POLICY

8.1 The Company's decision as to the interpretation and operation of this Policy is final. The Company reserves the right to amend or terminate this Policy at any time.

Note: This policy will be reviewed annually and amended as /or when necessary.

This Policy has been approved and authorised by:

Name: William Robinson

Position: Managing Director

Date: 06.04.2022

Signature:

A handwritten signature in blue ink, appearing to read 'W. Robinson', written over a horizontal line.