

# Castell Howell Foods

## Anti-Slavery and Human Trafficking Policy



August 2019

### 1. Overview

Castell Howell Foods Limited is committed to taking all reasonable steps to prevent the exploitation and abuse of men, women and children at all stages within our supply chain in full support of and compliance with the provisions of the Modern Slavery Act 2015.

### 2. Purpose and Scope

The purpose of this policy is to define the Company's obligations to comply with the provisions set out in the Modern Slavery Act 2015.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

This policy does not form part of any employee's contract of employment and can be amended at any time.

### 3. Policy statement

Modern slavery is a crime resulting in abuse of the human rights of vulnerable workers taking various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

### 4. Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's

Doc: POL-HR001	Issue No:01	Document Controller	Review Period: 12 Months
Author: Gayle Budden	Date: 21.09.16	Aled Gravell	Page 1 of 3

legal and ethical obligations.

Mike Davies, Director of Human Resources has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. He is also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

## 5. Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

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 or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

## 6. Identifying and reporting slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- (a) The person is not in possession of their own passport, identification or travel documents;
- (b) The person is acting as though they are being instructed or coached by someone else;
- (c) They allow others to speak for them when spoken to directly;
- (d) They are dropped off and collected from work;
- (e) The person is withdrawn or they appear frightened;
- (f) The person does not seem to be able to contact friends or family freely;
- (g) The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

Doc: POL-HR001	Issue No:01	Document Controller	Review Period: 12 Months
Author: Gayle Budden	Date: 21.09.16	Aled Gravell	Page 2 of 3

If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

## **7. Risk and Our procedures**

The principal areas of risk related to slavery and human trafficking is in our supply chains. We manage these risk areas through our assessment questionnaire for suppliers.

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We publish this statement on our website and it can be accessed at [www.castellhowellfoods.co.uk](http://www.castellhowellfoods.co.uk).

This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

## **8. Training and communication**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

## **9. Breach of the policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct in accordance with the Castell Howell disciplinary procedure.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

## **10. Monitoring our procedures**

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

Doc: POL-HR001	Issue No:01	Document Controller	Review Period: 12 Months
Author: Gayle Budden	Date: 21.09.16	Aled Gravell	Page 3 of 3