

# **Carclo PLC: Policy on Modern Slavery and Child Labour**

## **1 Introduction: modern slavery & human trafficking**

The UK Government enacted the Modern Slavery Act 2015 (the **Act**) in order to better tackle the crimes of modern slavery and human trafficking, in all of their forms. As well as consolidating the criminal offences relating to modern slavery and human trafficking, the Act also introduced a requirement for each business to publish an annual statement setting out the steps taken by the business to ensure that modern slavery and human trafficking are not taking place in the business or supply chains.

## **2 Our business and policy on modern slavery and human trafficking**

2.1 Carclo operates across six different countries to support its global customer base. We ensure that we operate ethically in all of our locations respecting local regulations and we develop a culture of best practice in operational management, customer responsiveness as well as ensuring that our approach to health and safety is consistent in all of our operations.

2.2 In particular, we refuse to tolerate modern slavery & human trafficking occurring anywhere in our supply chains. We are committed to:

- (a) only working with suppliers and other business partners who adopt the same ethical standards as we adopt in our business;
- (b) promoting best practice in our procurement processes with the aim of eliminating the risk of modern slavery & human trafficking occurring in our supply chains;
- (c) ensuring that our customers can be confident that the products that they purchase from us are free of the taint of modern slavery & human trafficking;
- (d) ensuring that our HR and Procurement teams have an awareness of the Act, and understand their role in supporting our policy on supply chain transparency; and
- (e) understanding the heightened risks that may occur in some territories and in relation to some supplies, and tailoring our approach accordingly.

## **3 Our policy on child labour**

3.1 We require all of our suppliers to adhere to the standards set out by the International Labour Organisation as regards the employment of children and young people. In particular:

- (a) children must not be recruited before they have reached the age of completion of compulsory schooling, and in any case not before the age of 15; and
- (b) those under 18 must not be required to perform hazardous duties.

## **4 What this policy means for you**

4.1 We require all of our staff, suppliers, contractors, agents and all other individuals and businesses with whom we work, to comply with this policy and our approach to modern slavery and human trafficking.

4.2 We require all relevant individuals:

- (a) to read and ensure they understand this policy;

- (b) to report any behaviour which they believe may breach this policy to an appropriate manager;
- (c) to communicate our policy to all relevant colleagues and business partners whenever appropriate; and
- (d) to ensure they carry out their roles in a way which enables Carclo to comply with this policy.

4.3 We require all businesses with whom we work:

- (a) to adopt policies and procedures within their own businesses to enable them (and their staff) to comply with this policy;
- (b) to ensure that their staff hiring practices (including for the hiring of temporary staff via agencies and similar providers) are designed to establish that all workers are giving their labour of their own volition and are not being controlled by others to any extent;
- (c) to adopt policies and procedures in relation to the selection and management of their own suppliers which aim to identify and manage the risks of modern slavery and human trafficking;
- (d) to maintain records to enable them to provide us with the information we need to publish an annual supply chain transparency statement; and
- (e) to monitor the success of the policies and procedures described above, in order to constantly raise standards.

## **5 Consequences of breaching this Policy**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 5.3 We may terminate our relationship with suppliers and other business partners if they breach this policy.