

Castle Claysales Limited

Modern Slavery Policy

Policy Statement / Procedure:

What is modern slavery?

Modern slavery takes various forms, including holding another person in slavery or servitude, requiring another person to perform forced or compulsory labour and arranging or facilitating the human trafficking of another person, all of which have in common the deprivation of a person's liberty by another in order to exploit them. All forms of modern slavery are prohibited by this policy. Some practical examples of modern slavery are: (a) an employer confiscating a worker's passport and/or official papers, which means the worker is unable to leave the country of the employer; (b) an employer forcing its workers to work by making threats such as physical harm to the workers themselves or their families or withholding wages from the workers. However, these examples are not exhaustive.

Therefore, care should be taken in any situation to determine whether a particular matter relating to workers, the treatment of workers more generally or their working conditions within our business or our supply chain constitutes modern slavery and would be prohibited by this policy. If there is any doubt about whether a situation or set of facts could constitute modern slavery, guidance should be sought as described below.

If you are in doubt, you should, in the first instance, raise this with your line manager and, if the line manager has any doubts, the line manager should seek guidance from the Managing Director.

Why is compliance with this policy important?

Modern slavery is a criminal offence in the United Kingdom and in other countries in which Castle Claysales operates. An individual who does something prohibited by this policy is therefore likely to commit a criminal offence and, if prosecuted, be subject to imprisonment and/or a fine.

Importantly, please also be aware that, if any employee of Castle Claysales commits a modern slavery criminal offence, this would have a serious detrimental effect on the company. Clearly this would have a significant negative impact on our reputation. It may also prevent Castle Claysales from participating in contract opportunities tendered by other organisations, which in turn would have a serious negative impact on our business.

Any Castle Claysales employee who breaches this policy is also likely to face disciplinary action, which could result in dismissal for misconduct.

What should I do if I am an employee of Castle Claysales and I suspect modern slavery within the Castle Claysales business or supply chains?

If you have reasonable grounds to suspect that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains in breach of this policy, you are encouraged to report this as soon as possible to the Managing Director or other Director.

Castle Claysales aims to treat all reports of suspected modern slavery seriously and sensitively.

Castle Claysales will accept reports made anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

We encourage openness and will support anyone who raises a genuine concern about modern slavery in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions. Any claims or allegations made which are found to be malicious or vexatious may result in disciplinary action being taken against the individual.

What should I do if I am a third party dealing with Castle Claysales and I suspect modern slavery within the Castle Claysales business or supply chain?

As noted above, Castle Claysales aims to treat all reports of suspected modern slavery seriously and sensitively. Castle Claysales therefore encourages any third party who is dealing with Castle Claysales and who has a genuine concern about modern slavery in good faith to write, in confidence, to the Managing Director to raise their concern.

Roles and Responsibilities:

All those to whom this policy applies are required to familiarise themselves, and comply, with the terms of this policy.

Managers/supervisors at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

All employees who deal with suppliers, contractors and business partners are also

responsible for communicating this policy and seeking to ensure that those third parties also comply with this policy.

The board of directors of Castle Claysales Ltd have overall responsibility for ensuring compliance with our legal and ethical obligations.

A handwritten signature in black ink, appearing to read 'Chris Rhodes', written over a dotted line.

Chris Rhodes
Managing Director

19th November 2018