

C&D Access Ltd

Anti-Slavery and Human Trafficking Policy

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2	09.12.2022	Ana Gamarra	Spencer Clift	Released

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Rev	Date	Amendment	Amended by	Signature
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Table of contents

Introduction	3
Policy	3
Employee responsibility	3
Non compliance.....	4
Awareness	4
Reviewing policy.....	4

Introduction

C&D Access Ltd maintains relationships with many different organisations in its supply chain, as well as employing a variety of people.

In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains. The policy below underpins our approach, and will be used to inform our Statement on Slavery and Human Trafficking.

C&D Access Ltd have adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with C&D Access Ltd to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with it.

As part of our culture of good governance for good business, at C&D Access Ltd we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, suppliers and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is: zero tolerance.

Policy

The Company will:

- ✓ Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- ✓ Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- ✓ See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee responsibility

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The Managing Director has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Employees of 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 and the issue of modern slavery.

Non compliance

We aim 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith 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. The Company will accept and take seriously concerns communicated 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.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Awareness

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Reviewing policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

Spencer Clift
Managing Director

A handwritten signature in black ink, appearing to read "Spencer Clift", is positioned below the printed name and title.

December 2022