

Modern Slavery Policy Statement

D R Caswell Limited trading as Caswells Group and Cutlers

Modern Slavery is an umbrella term that refers to situations of exploitation that a person is not able to refuse or leave because of threats, violence, deception and / or abuse of power.

D R Caswell Limited recognises its responsibilities under the UK Modern Slavery Act 2015 and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain.

This statement sets out the actions and measures we have taken, and will continue to take, to prevent modern slavery and human trafficking within our operations and supply chains.

D R Caswell Limited operates across the UK providing industrial services, supplies, and equipment.

With a turnover approaching £36m, we recognise the importance of robust supply chain management and due diligence to prevent exploitation and protect human rights.

D R Caswell Limited is committed to ethical principles and requires all employees and those working on our behalf to comply with employment legislation and supply chain management legislation in the countries within which we operate. We are also proud to be a Living Wage Employer, ensuring that all directly employed staff and regular on-site contractors are paid at least the real Living Wage, helping reduce the risk of in-work poverty and exploitation.

This policy applies to all persons who act on our behalf in any capacity including employees at all levels, directors, consultants, contractors, agency workers, volunteers, interns, business partners, and our supply chain.

D R Caswell Limited is committed to acting ethically and with integrity in all our business relationships, and to taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any business relationship with us.

We reinforce these commitments through participation in SEDEX and EcoVadis, and through our certification to ISO 9001 (Quality Management) and ISO 45001 (Occupational Health and Safety), and our status as a Living Wage Employer, all of which underpin transparency, accountability, and respect for human rights across our operations and supply chain.

Risk Assessment and Due Diligence

Our approach to risk assessment takes into consideration:

- Desk-based research, supplier questionnaires, and supplier engagement.
- Dialogue with stakeholders and expert partners.

Where risks are identified, we conduct due diligence within our supply chains and operations to understand whether there is evidence of modern slavery issues and whether sufficient controls are in place.

As part of our commitment to transparency, we actively monitor supply chain practices using SEDEX (Supplier Ethical Data Exchange) membership and EcoVadis sustainability assessments, ensuring that suppliers meet international ethical trade and human rights standards.

Supply Chain Management

- We are committed to not supporting or dealing with any business known to be involved in slavery or human trafficking.
- As part of our due diligence, prior to approving a new supplier, we review the controls they undertake to eliminate modern slavery and human trafficking, particularly in relation to goods imported from outside the UK, where risks are often higher.
- Ongoing supplier relationships are assessed through SEDEX and EcoVadis reporting, together with our internal supplier management processes.

Responsibility

- Senior Management take full responsibility for implementing this policy and for ensuring that all those who report to them understand and comply with its requirements.

Compliance

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all employees and those working under our control.

Staff must report to their Manager at the earliest opportunity if they suspect or believe there has been a breach of this policy, or that one may occur in the future.

D R Caswell Limited provides systems that encourage reporting of concerns and protects whistle-blowers.

D R Caswell Limited is committed to terminating relationships with suppliers, individuals, or business partners working on our behalf if this policy is breached.

D R Caswell Limited is committed to ensuring transparency within our own business and in its approach to tackling modern slavery. D R Caswell Limited regularly reviews its practices and policies to ensure we have the most effective responses to prevent and remediate any negative impact on human rights and prevent all forms of Modern Slavery in our operations and supply chain.

Measuring Effectiveness (KPIs)

To assess the effectiveness of our approach, we monitor and report on a suite of indicators, including but not limited to:

- Percentage of staff trained on modern slavery awareness each year.
- Number of reports raised through our whistleblowing or grievance mechanisms and actions taken.

These KPIs are reviewed annually through our Business Management System and management review process:

Training and Communication

We are committed to ensuring that all employees are made aware of this Modern Slavery policy. Where necessary, information, instruction, and training will be provided to maintain responsibilities and adherence to ethical business practices, strengthening the company and its reputation for independence, and ethical business practices.

We are also committed to ensuring that our zero-tolerance approach to modern slavery is clearly communicated to all suppliers, contractors, and business partners at the outset of any business relationship.

Accountability

Peter Caswell, Managing Director, is responsible for ensuring the implementation of this Modern Slavery policy and for making the necessary resources available to realise our commitments. Responsibility for delivering on this policy rests with employees at all levels within the organisation.

This policy is maintained as documented information, communicated throughout the organisation, made available to interested parties as appropriate, and reviewed at least annually to ensure its ongoing suitability, adequacy, and effectiveness. Performance against this policy is monitored through our Business Management System and management review process to prevent include compliance with the Modern Slavery Act 2015 and the prevention of exploitation within our operations and supply chain.

This policy is endorsed by Paul Murphy, Commercial Director, for and on behalf of the Managing Director, who retains overall responsibility for Modern Slavery within the organisation.



Commercial Director

Policy date: 1 September 2025

Policy re-approved: 12 September 2025