

Modern Slavery Policy Statement

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 are committed to ethical principles, and require all employees to comply with the employment legislation and supply chain management legislation in the countries within which we operate. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. 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.

Caswells are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any business relationship with the Company.

Our risk assessment approach takes into consideration the mapping of our supply chains and operations, desk based research, supplier questionnaires, supplier engagement, and discussions with our expert stakeholders.

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

Supply Chain Management

- Caswells shall not support or deal with any business which is known to be involved in slavery or human trafficking.
- As part of our due diligence, prior to approving a new supplier the company shall review the controls which they undertake to eliminate modern slavery and human trafficking, particularly in regard to goods imported from outside the UK which are potentially more at risk of involving slavery and human trafficking.

Responsibility

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

Compliance

- All staff shall read, understand, and comply with this policy.
- All staff must avoid any breaches of this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.
- All 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 a breach may occur in the future.
- Staff are reminded that there are systems in place to encourage the reporting of concerns and to protect whistle blowers.

Communication and Training

- Where necessary, the company shall provide training about the risks of modern slavery and human trafficking to maintain a high level of understanding of this issue in our workforce.

The company operates a zero tolerance approach to modern slavery that shall be clearly communicated to all suppliers, contractors, and business partners when a business relationship is commenced.

Breaches of Policy

- Any employee who breaches the policy shall face disciplinary action which could result in dismissal for misconduct or gross misconduct.
- Caswells shall terminate relationships with suppliers, individuals, or business partners working on our behalf if this policy is breached.

Caswells are committed to ensuring transparency within our own business and in its approach to tackling modern slavery. Caswells regularly review our 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.

This policy shall be maintained as documented information, shall be communicated within the organisation, shall be available to interested parties as appropriate, and regularly reviewed.

P. Caswell

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