

Captrad Ltd

Anti-Slavery Policy

1. Policy Statement

- 1.1 This Policy sets out the Company's zero-tolerance to modern slavery. The Company is committed to acting ethically and with integrity in all its business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its UK business operations or in any of the Company's supply chains
- 1.2 Modern slavery is a crime and a violation of fundamental human rights. This company recognises this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.3 The Company is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its suppliers, contractors and other third parties. As part of the Company's contracting processes, it expects that its suppliers will hold their own suppliers to the same standards set out in this policy.

2. Policy Application

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, director, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 2.2 This policy does not form part of any employee's contract of employment and the Company may amend it at any time.

Captrad Ltd

Anti-Slavery Policy

3. Responsibility For The Policy

- 3.1 The Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.
- 3.2 The Directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management 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 and the issue of modern slavery in supply chains.

4. Compliance With The Policy

- 4.1 All staff and third parties are required to raise any concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.
- 4.2 If any staff believe or suspect a breach of this policy has occurred or that it may occur the individual must notify either their manager or the UK Legal Department or report it to a senior Company point of contact as soon as possible.
- 4.3 If staff or third parties are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, this should be raised as set out in paragraph 4.2
- 4.4 All managers are responsible for ensuring this policy and the Company's zero-tolerance approach to modern slavery is communicated to all employees and for ensuring those individuals reporting to them understand and comply with this policy and are given adequate and regular training as applicable on the policy and the issue of modern slavery in supply chains.
- 4.5 Management have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Captrad Ltd

Anti-Slavery Policy

- 4.6 All managers are responsible for procurement of goods and / or services must ensure that this policy and the Company's zero-tolerance approach to modern slavery is communicated to all third parties during the procurement process and / or at the outset of each business relationship.

5. Breaches of 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 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

Phil Capstick

Director