

## MODERN DAY SLAVERY POLICY

<b>Person Responsible:</b>	Mark Francis
<b>Date Last Updated:</b>	11/07/2024
<b>Current Status:</b>	Current
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<b>Approved By:</b>	Lisa Purvey
<b>Change Identification:</b>	Changes to the document will be underscored in green with a green border. (Example of change)

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Date of Issue	Revision Comments	Revision
11/07/2024		03
<b>Approved By:</b> Lisa Purvey		
<b>Position:</b> Managing Director		
<b>Signed:</b>	<b>Date:</b>	

Calstan Mechanical is committed to preventing modern-day slavery and human trafficking in all its business activities. We acknowledge the importance of respecting human rights and conducting our operations with integrity. This policy outlines our commitment to ensuring that slavery and human trafficking have no place in our supply chains or any part of our business.

Our stance is unequivocal – we will neither endorse nor participate in any form of slavery or human trafficking, and we expect the same uncompromising adherence to these principles from our employees, suppliers, and business partners. Calstan Mechanical has instituted strong measures to systematically assess and mitigate the risk of such situations, including:

- We conduct comprehensive evaluations of our supply chain and business operations to identify and address potential slavery risks.
- Supplier assessments, audits, and ongoing monitoring are diligently implemented to ensure compliance with anti-slavery standards.
- We communicate our anti-slavery commitment to suppliers and actively encourage them to adopt similar ethical practices.
- Training programs are conducted to enhance awareness among our employees regarding the realities of modern-day slavery.
- Clearly communicated procedures empower individuals to report concerns without fear of retaliation.
- Supplier contracts explicitly prohibit forced labor, child labor, and human trafficking, with stipulated consequences for non-compliance.
- Every employee is provided with written employment contracts, and stringent checks ensure the right to work in the United Kingdom for all potential employees.
- Thorough validation of legal documents is undertaken to verify authenticity, recognising that victims may be compelled to use false or forged identities.
- Wages are directly deposited into employees' bank accounts, eliminating the possibility of cash-in-hand or check payment arrangements.
- Checks on names and addresses of our workforce are conducted to identify shared occupancy situations, a recognised indicator of potential exploitation.
- Employees are well-informed about their statutory rights, ensuring they are empowered to protect themselves.
- Visual cues such as signs of malnourishment, unkempt appearance, withdrawal, or physical injuries are scrutinised. Any suspicions of exploitation or trafficking prompt immediate action, with contact initiated with the appropriate authorities.

### **Responsibility and Implementation:**

All employees and members of our supply chain bear the responsibility of upholding this policy's requirements to collectively ensure the prevention of modern-day slavery and human trafficking. Implementation will be achieved by adhering to the procedures and guidance documents contained within the Company Management System.

### **Review and Revision:**

The Modern-Day Slavery policy will undergo periodic reviews to ensure its effectiveness and relevance. Updates may be made as necessary. Employees are encouraged to provide feedback to ensure continuous improvement. Our commitment to safety remains steadfast, creating a workplace where every individual can perform their duties with the utmost care and protection.