

### INTRODUCTION

Modern slavery is a crime and a serious violation of human rights and dignity, taking various forms such as slavery, servitude, forced or compulsory labour and human trafficking. All forms of modern slavery deprive a person's liberty, leading to exploitation by others for personal or commercial gain.

Corderoy recognise that modern slavery is a hidden problem within our society. It is strictly prohibited in our operations and supply chain and we have therefore developed this policy to ensure we act responsibly, understand the risks, and take measures to ensure all of our staff, business partners and supply chain are also aware of these risks and are empowered to take action and raise concerns.

By acknowledging this risk and being aware of the challenges, we will in turn bring about increased visibility of this, particularly within our supply chains. This will ultimately ensure Corderoy is meeting its obligations to this important issue.

### POLICY STATEMENT

Although Corderoy is not required to formally publish a 'Slavery and Human Trafficking Statement' in compliance with the Modern Slavery Act (2015), we are committed to our responsibility to the Act and are steadfast in our zero-tolerance approach in these matters. This policy demonstrates our commitment to acting ethically and with integrity in all areas of our business. It ensures we have effective control measures in place to ensure that all of our staff, business partners and supply chains uphold our high ethical standards to ensure modern slavery is not taking place within our business or our supply chain.

We consistently ensure we prohibit practices known to contribute to the risk of modern slavery, including, but not limited to:

- We will never use slave labour, illegal child labour or forced labour.
- We will never knowingly procure or use any supplies that have been produced using slavery.
- Ensure that the overall terms of employment are voluntary.
- Ensure we follow all local applicable laws pertaining to minimum age requirements, wages, number of hours worked in a seven day week, overtime and benefits.
- Require that any supplier to Corderoy comply with the laws regarding human trafficking and slavery in the country or countries of their origin and use.
- Maintain awareness of our commitment to preventing modern slavery, whether within the business or our supply chain and raise any concerns without delay; and ensure staff can approach management to raise concerns in confidence so that these may be dealt with appropriately.

### SCOPE

This policy applies to all people working for Corderoy or on our behalf in any capacity, including Directors, employees of all levels, consultants, contractors, and business partners.

Any employee in breach of this policy is liable to disciplinary action which could ultimately end in dismissal. We will terminate our business relationship with any of our business partners working for us or on our behalf if they breach this policy.

This policy does not form part of an employee's contract of employment and we reserve the right to amend or withdraw it at any time.

### **ROLES AND RESPONSIBILITIES**

The Managing Director has overall responsibility for Corderoy's modern slavery initiatives and overall compliance with this policy.

Office Directors are responsible for ensuring their staff understand and comply with the policy and that they undertake periodic modern slavery training.

All Corderoy staff and individuals working on Corderoy's behalf must read, understand and comply with this policy. The prevention, detection and reporting of modern slavery within our business and supply chain is the responsibility of all who are working for us or on our behalf. All staff are expected to apply due diligence to spotting signs of modern slavery, within the business or supply chain and to raise such concerns without delay. Any purchasing, including material or labour sourcing placements or decisions that could increase the risk of modern slavery must be thoroughly analysed to ensure the risk is avoided. Any activity that might lead to, or suggest, a breach of this policy must be avoided.

### **DEFINITIONS, OFFENCES AND PENALTIES**

Corderoy will uphold all relevant laws including, but not limited to, the Modern Slavery Act 2015.

Modern Slavery is the severe exploitation of other people for personal or commercial gain.

It is an offence in the UK for a person to:

- Either holds another person in slavery or servitude, or requires them to perform forced or compulsory labour, where they know or ought to know that person is held in, or required to perform, slavery or servitude
- Arrange or facilitate the travel of another person with a view to or with the intention of that person being exploited, where they know or ought to know that person is likely to be exploited during or after the travel.

Modern slavery is punishable by law and carries a maximum penalty of up to life imprisonment and/or an unlimited fine.

### **REPORTING A CONCERN**

Any individual working for or on Corderoy's behalf must raise concerns as soon as possible if they are unsure whether a particular act, treatment of a worker/workers, or working conditions within our supply chain constitutes any form of modern slavery.

Concerns should be reported in accordance with the Whistleblowing Policy. The overseeing Director (or HR Manager) who receives an allegation must refer the matter swiftly to the Managing Board member responsible for their office. The Managing Board will determine how the matter will be investigated.

'Red flags' that may indicate possible modern slavery are set out below (see 'Corderoy's Risk Mitigation Measures').

We are committed to openness and transparency at all times and seek to create a culture where it is safe and acceptable for employees to raise concerns internally within Corderoy. We will support any individual raising a concern in good faith and in accordance with this policy. We are committed to ensuring that no-one reporting concerns in this regard will suffer detrimental treatment as a result of a report made in good faith, even if it turns out to be mistaken.

Detrimental treatment includes disciplinary action, up to and including dismissal, threats or unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform the HR department immediately.

### **CORDEROY'S RISK MITIGATION MEASURES**

Corderoy take the following measures to ensure modern slavery risks are managed within our business:

#### ***Employees***

- Recruiting managers, overseen by the HR department will undertake a right to work check. This will be undertaken in strict accordance with the Asylum and Immigration procedures.
- The HR department will ensure regular and consistent monitoring of salaries, ensuring compliance at all times with the National Minimum Wage legislation.
- The HR department will monitor working hours to ensure compliance with the Working Time Directive. Concerns will be escalated to the appropriate Board Director.
- Upon appointment, all staff (including part-time, temporary and agency workers), receive a copy of the Corderoy Anti-Corruption and Bribery policy and Whistleblowing policy and are expected to comply fully at all times with these policies. In addition, during induction to Corderoy, staff will receive appropriate training in all such areas of business compliance.
- Staff involved in managing others will be alert to 'red flags and raise appropriate concerns. Red flags may include, but are not limited to:
  - Paying salaries into different bank accounts
  - Documents look falsified (passport)
  - Show signs that their movements are being controlled
  - Fear or anxiety
  - Don't know their home or work address
  - Working excessively long hours with little or no breaks, rarely taking days off
  - Little or no interaction with others
  - in fear of authorities
  - Physical injuries

#### ***Supply Chain***

- Suppliers, during the procurement process will be required to provide confirmation of their compliance with the requirements of the Act.
- Contracts with suppliers will include a requirement to comply with the Act. In addition, sub-contracting clauses are included in our contracts to ensure that where sub-contractors are used, Corderoy are informed about who will be undertaking the work.
- Staff involved in the procurement process will review the supply chain periodically to highlight any 'red flags' and raise appropriate concerns. Red flags may include, but are not limited to:
  - Excessive overtime of workers within the supply chain
  - Workers being paid cash in hand
  - Workers working in poor conditions

- Signs of restricted freedom/movements of supply chain workers
  - Behaviour signs – fear or anxiety, withdrawn or silent. Physical injuries.
  - Products being sold by our suppliers that are considered cheap and below market value.
  - Unknown origins of products supplied.
- In addition, all staff, in receiving appropriate business compliance training identified above, will be competent to apply their own due diligence when working with supply chain partners.

### **Clients and Business Partners**

- We will advise any client or business partner of any concerns or potential concerns that contravene the Modern Slavery Act (2015) and highlight any risks of slavery or human trafficking in their supply chains or operations. Such concerns or risks may come to light through observations of our staff or through our investigations during a commissioned audit.
- Engagement letters or contracts of employment with clients and business partners will include a contractual obligation to comply with the Modern Slavery Act (2015)
- In addition, it will be a contractual obligation that any subconsultants engaged will also comply with the Act.

### **MONITORING**

Ongoing compliance with this policy will be monitored by key staff within the business appropriate to their role. Furthermore, data from internal audit reports will be reviewed for monitoring and compliance purposes.

### **AWARENESS, TRAINING AND COMMUNICATION**

Corderoy acknowledges that continued success of its modern slavery measures is based on an effective training and awareness programme. To facilitate our efforts in this regard, we have in place a mandatory e-learning strategy which all staff must complete during onboarding and periodically thereafter. At a minimum, this includes Business Compliance Essentials. Furthermore, monitoring and reporting of compliance with the mandatory e-learning provision will be undertaken periodically by the HR department and non-compliance will be reported to the Managing Board.

Furthermore, our zero-tolerance approach to modern slavery is communicated to all consultants, contractors, suppliers and business partners at the outset of Corderoy's business relationship with them and as appropriate thereafter.

### **FURTHER INFORMATION**

#### Whistleblowing Policy

Staff should raise concerns with an overseeing Director or the HR department in the first instance.

Staff can also report suspicion, seek advice or further information by the following means:

- Modern Slavery Helpline - 08000 121 700. This helpline is available 24 hours/day, 365 days/year.
- Crimestoppers Helpline – 0800 555 111. This helpline is available 24 hours/day, 365 days/year.
- [www.anti-slavery.org](http://www.anti-slavery.org)
- Police: [Home | Police.uk](#)     **Or**     999 - If there is a crime in action or a threat to life.

### REVIEW AND APPROVAL

Policy Author: Tracey Hancock, HR Manager

Policy reviewed by: Tom Smailes, Director  
Date: 13 January 2025

Date of next review: January 2026

### **Approved by:**



Angela Austin  
Managing Director

Dated: 17 January 2025