

Modern Slavery & Human Trafficking Policy Statement

In line with our Values, and to comply with current legislation, we have the following policy with regard to Modern Slavery and Human Trafficking.

Introduction

Carefoot Plc is committed to improving practices to combat slavery and human trafficking. Since the introduction of the Modern Slavery Act 2015, we have reviewed our supply chain policies and are training our managers to ensure we all understand and are delivering on our responsibilities in this regard.

Our Business

Carefoot Plc is organised into two business units, Walter Carefoot & Sons (Construction) Ltd and Walter Carefoot & Sons (Properties) which are located in Longridge employing approximately 50 employees, both operate in the north west of England.

Our Supply Chains

Our supply chains include approximately 750 UK suppliers and subcontractors.

Our Policy on Modern Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have revised relevant policies to reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We have also referenced our responsibilities on Slavery and Human Trafficking in our Values of Respecting Each Other and Building Communities.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have updated our Procurement documentation to reference the Modern Slavery Act 2015 and contacted all our suppliers to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

Supplier Adherence to our Values and Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have put in place a rigorous supply chain compliance programme. This consists of:

- A clear statement in our Tender Document about our attitude to modern slavery and human trafficking and our requirements of our suppliers which ensures any new suppliers meet our criteria
- A programme to ensure we have documented compliance statements from all our current suppliers confirming they meet our criteria
- A clause in our recruitment agency contracts regarding the obligation of our agencies and ourselves under the Modern Slavery Act 2015
- Internal communication to ensure all our managers and procurers are aware of and commit to delivering our policy and approach concerning modern slavery and human trafficking

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our employees. We also require our business partners to provide training to their staff and suppliers and providers.

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicator (KPI) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- An annual review by our suppliers to confirm there is no slavery in their supply chain.
- Suppliers to submit in writing a confirmation that the review has been completed and that no slavery or human trafficking has been identified in their supply chain.

As this is a recent policy, effective compliance is currently being measured.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018/19.

Helpline

If you have any concerns regarding Modern Slavery and Human Trafficking then you can phone the National Helpline on 08000 121 700



Andrew Cross
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