

MODERN SLAVERY POLICY



Last review: 19/01/2023

Next review: 19/01/2024

City & Essex Limited and all affiliated subsidiaries.

Mission Statement

This policy statement sets out City & Essex Ltd's actions to understand all potential modern slavery risks and put in place steps to ensure that there is no slavery or human trafficking in its own business and its supply chains.

Modern slavery is the severe exploitation of other people for personal or commercial gain. It is a crime resulting in an abuse of the human rights of vulnerable people from the UK and overseas. It can take various forms, such as slavery, child labour, servitude, forced or compulsory labour and human trafficking.

Modern slavery can take various forms, including:

Human trafficking

The process of trapping people through the use of violence, deception or coercion and exploiting them for financial or personal gain.

Forced labour

Any work or service which people are forced to do against their will, under threat of punishment. Almost all slavery practices contain some element of forced labour.

Bonded labour

Also known as debt bondage or debt slavery, a person is forced to work to pay off a debt. They are tricked into working for little or no pay, with no control over their debt.

Child Slavery

The enforced exploitation of a child for someone else's gain meaning the child will have no way to leave the situation or person exploiting them.

Child Marriage

This can be referred to as slavery if the child has not genuinely given their free and informed consent to enter the marriage, if they are subject to control in the marriage (particularly through abuse and exploitation), or if they cannot realistically leave or end the marriage.

Descent-based slavery

People are born into slavery because their ancestors were captured into slavery, and their families have 'belonged' to slave-owning families ever since.

Domestic slavery

Domestic workers in private homes where the circumstances and conditions of their work amounts to slavery. Examples include: their employer stops them from leaving the house, doesn't pay their wages, uses violence or threats, withholds their identity documents, limits their contact with family and forces them to work.



Slavery in Supply Chain

Long and complex supply chains make it challenging to oversee who is working where and under what conditions, from extracting raw materials, manufacturing goods, or shipping and delivering those goods to customers.

Slavery in the UK

Modern slavery is present in every area of the UK and can take many forms. The most common form of slavery in the UK is forced labour, more often found on farms and in construction, shops, bars, nail salons, car washes or manufacturing.

City & Essex Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships. City & Essex will implement and enforce effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. City & Essex Ltd also expects the same high standards from all its suppliers, contractors and other business partners.

Identifying potential victims of modern slavery can be challenging because the crime can manifest itself in many ways. In addition, some suppliers may go to great lengths to hide that they are using slave labour. However, City & Essex Ltd accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

City & Essex Ltd uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

This policy applies to all individuals working for City & Essex Ltd or on our behalf in any capacity, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

Responsibility

The Board of Directors is responsible for ensuring that this policy complies with the Company's legal and ethical obligations.

Senior Management is responsible for ensuring that those reporting to them understand and comply with this policy.

Compliance

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chains are the responsibility of all those working for City & Essex Ltd or under the Company's control. Employees are required to avoid any activity that might lead to a breach of this policy.

If anyone believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with the City & Essex Ltd's Whistleblowers Policy. Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

If anyone is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, again, it should be immediately raised. Matters can also be raised by contacting the government's



Modern Slavery Helpline on 0800 0121 700, which can provide further information and guidance on modern slavery.

City & Essex Ltd aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. City & Essex Ltd is committed to ensuring no one suffers any detrimental treatment or victimisation due to reporting in good faith their suspicion that modern slavery may be taking place in any part of its business or supply chains.

City & Essex Ltd.'s zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

City & Essex Ltd may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to be involved in modern slavery.

Full Name	Mr Ian Hookway
Position	Managing Director
Date	19/01/2023

