



Anti-Slavery & Human Trafficking Policy CES IMS-POL2

Status: Ratified

Document Type: Policy



Document Control Sheet

Date	Rev	Amended By	Comments/Details
14/10/2019	1	P McGuinness	First Issue
14/10/2020	2	P McGuinness	Annual Review
14/10/2021	3	P McGuinness	Updated to New Format
14/10/2022	4	P McGuinness	Annual Review

Slavery and human trafficking remain a hidden blight on our global society. The Company fully acknowledges and accepts the responsibly to be alert to the risks, however small, in our business and in the wider supply chain. All employees are fully aware of their obligation to report concerns and management are expected to act upon them.

Company Policy on Human Trafficking & Modern-Day Slavery

Colloide recognise and acknowledge responsibility to the Modern Slavery Act 2015. They are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects 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. Colloide Engineering Systems is committed to driving out acts of modern-day slavery and human trafficking within its business and that from its supply chains and sub-contractors.

Colloide directors and senior management will take responsibility for implementing this policy and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within its organisation and within its supply chains and sub-contractors.

Due Diligence Process on Slavery & Human Trafficking

- Consider modern slavery factors when making procurement decisions
- Develop awareness of modern slavery issues
- Encourage suppliers and contractors to take their own action and understand their obligations to the new requirements.
- Build long standing relationships with local and oversee suppliers and customers and make clear Company expectations of business behaviour
- With regards to national or international supply chains, our point contact is preferably
 with a UK/EU company or branch and the Company expect these entities to have
 suitable anti-slavery and human trafficking policies and processes. The Company expects
 each entity in the supply and delivery chain to, at least, adopt 'one-up' due diligence on
 the next link in the chain
- The Company have in place a policy that clearly outlines a system and person of contact, to encourage the reporting of concerns and the protection of whistle blower

Our Supply Chain

As part of the Colloide's due diligence processes into slavery and human trafficking the sub-contractor/supplier approval list with involve a review of the controls undertaken by them. Colloide will not support or deal with any business knowingly involved in slavery or human trafficking.

Supplier Adherence to our Values

The Company have zero tolerance to slavery and human trafficking. The Company expect all those in our supply and delivery chain and (sub) contractors comply with Company values. The Senior Management team are responsible for compliance in their respective departments and for their supplier relationships.

Your Responsibilities

Training on anti-slavery and human trafficking is provided to all staff at induction, and they all must ensure that they read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or the Managing Director as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Managing Director.

How to Raise a Concern?

It is important that you tell a company director or senior manager as soon as possible if you have any concerns regarding the supply chain or suspect that this may happen in the future or believe that someone is victim of another form of unlawful activity.

Our Effectiveness in Combatting Human Trafficking & Modern-Day Slavery

The Company use the following key performance indicators (KPIs) on an ongoing basis to measure how effective the Company have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply and delivery chains:

- Completion of House Audits by Senior Management;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, Company expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the current financial year.

This Policy takes into account and supports the policies, procedures and requirements documented within our Integrated Management System- compliant with the requirements of ISO 9001, ISO 14001 and ISO 45001. The implementation and operation of this management system underlines our commitment to this policy.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed.

puls

Date Reviewed: 14th October 2022

SIGNED BY:

Date of Next Review: 14th October 2023