



Modern Slavery Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Castleview Group is committed to ensuring that there is no modern slavery or human trafficking in its supply chains, or in any part of its services. This statement sets out the preventative steps that CVG is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

Responsibilities

The company, managers and colleagues have a responsibility to ensure fellow workers are safeguarded, treated fairly and with dignity. Everyone must observe this policy and be aware that 'turning a blind eye' is unacceptable and not an option.

Castleview Group will:

- Maintain clear policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation;
- Be clear with our recruitment policy;
- Examine our supply chains and be clear with key suppliers our expectations regarding the Act;
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers etc to ensure we are confident who is working for us;
- Continue to have in place an open and transparent grievance process for all staff;
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare;
- Make it clear that we take our responsibilities to our employees and our clients seriously.



Managers will:

- Listen and be approachable to colleagues;
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- Remain alert to indicators of slavery (see identifying slavery);
- Raise the awareness and ensure all employees are provided with a copy of this policy and be aware of their responsibilities;
- Use their experience and professional judgement to gauge situations.

Colleagues will:

have responsibilities under this policy. Whatever the role or level of seniority, they must:

- Keep eyes and ears open – If there is a suspicion that someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, this must be reported.
- Follow our reporting procedure if a colleague says something that might indicate they are or someone else is being exploited or ill-treated;
- Tell the leadership team if there is more that can be done to prevent people from being exploited.

Due Diligence Processes

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, CVG will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risks and other relevant factors). These processes will be subject to on-going assessment and review.

CVG identifies the following as the principle areas of potential risk:

- Short term hire of low skilled labour.
- Outsourced cleaning and waste management suppliers

Our Supply Chains

CVG has a zero-tolerance approach to modern slavery and human trafficking. It is committed to acting ethically and with integrity in all its business dealings and relationships. It seeks to ensure modern slavery and human trafficking are not taking place anywhere within the organisation or in any of its supply chains.

When procuring any types of goods or services, CVG requires any potential third- party suppliers to evidence that they operate a high level of corporate social responsibility during any tendering and selection process.

Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or our own policies and procedures, will be removed from the CVG's list of suppliers and will not be



considered for future supply to CVG unless they can demonstrate that these compliance requirements are met.

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 identify suitable training to our colleagues.

Our Policies

CVG currently applies the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery.

Grievance and Whistleblowing policies - these policies allow employees, learners and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Code of Conduct - this code sets out the actions and behaviour expected whilst employed by the CVG. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

Procurement Process- this is reflective of our commitment to act ethically and with integrity in all of our business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Safer recruitment Policy-this policy ensures that we follow transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

Reporting Slavery

- Talking to someone about concerns may stop someone else from being exploited or abused.
- If you consider that someone may be in immediate danger, call 999
- If you do not think someone is in immediate danger but have concerns, discuss them with the HR Manager who will decide a course of action which may include contacting the Police or the Gangmasters Licensing Association (GLA).
- Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, concerns are discussed first with the HR Manager before taking any further action.