

CROSKERRYS

**Ethical Trading, Modern Slavery & Human  
Trafficking Policy**

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Revisions Control Page

Date	Version	Summary of changes made	Changes made by (Name)
22/10/2018	1.0	Document Completed	Peter van Belle
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## **1.0 Overview**

Modern slavery is a crime and a violation of fundamental human rights. Croskerrys is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems to combat slavery, servitude, forced and compulsory labour, and human trafficking. Our suppliers must comply with these core principles and our ethical trading requirements are an essential part of doing business with Croskerrys.

The company has zero-tolerance for any form of human slavery. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships and will constantly uphold all laws relating to modern slavery, human trafficking and the use of child labour.

## **2.0 Purpose**

This ethical trading, modern slavery and human trafficking policy exists to set out the responsibilities of the company, those who work for it and its suppliers in regard to observing and upholding the company's zero-tolerance position on human slavery and exploitation.

## **3.0 Scope**

This policy applies to all employees whether temporary, fixed-term, or permanent, consultants, contractors, agents, and all of our third-party suppliers. The policy also applies to management and partners.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including provisions that require the third party to comply with the highest standards and procedures relating to modern slavery, human trafficking and the use of child labour. All new suppliers must undertake to comply with the terms of this policy.

## **4.0 Policy**

### **4.1 Definition of Modern Slavery**

Modern slavery is the recruitment, movement, harbouring or receiving of men, women or children through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Individuals may be trafficked into, out of or within countries and they may be trafficked for a number of reasons including forced labour, domestic servitude and sexual exploitation.

### **4.2 Employment is Freely Chosen**

There must be no forced, bonded or involuntary labour. Workers are not required to lodge passports or other identity papers with their employers and are free to leave their employer after reasonable notice. Employers and third parties must at all times comply with laws relating to their obligations relating to the deduction and/or payment of employment related taxes.

### **4.3 Freedom of Association**

Workers have the right to bargain collectively and join trade unions of their own choosing. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

### **4.4 Child Labour**

Child labour (as defined by the International Labour Organisation) involving any person younger than 15 years of age shall not be used and all third party suppliers must confirm that they comply with this obligation.

### **4.5 Working Hours**

Working hours shall be defined by contract and shall not normally exceed 48 hours per week. All overtime shall be voluntary and the total hours worked in any 7 day period shall not exceed 60 hours except in exceptional circumstances.

## **5.0 Employee's Responsibilities**

All employees of the company must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other modern slavery and exploitation information given by the company.

All employees of the company are equally responsible for the prevention, detection, and

reporting of modern slavery and other forms of exploitation. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

If any employee has reason to believe or suspect that an instance of modern slavery or exploitation involving a third party supplier has occurred or will occur in the future that breaches this policy, they must notify management.

## **6.0 How to Raise a Concern**

If an employee suspects that there is an instance of slavery or exploitation occurring in relation to the company, they are encouraged to raise their concerns at as early a stage as possible. If an employee is uncertain about whether a certain action or behaviour can be considered slavery or exploitation, they should speak to their line manager.

## **7.0 Protection**

The company will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

The company will ensure that no one suffers any detrimental treatment because they reported a concern relating to potential act(s) of slavery or exploitation.

## **8.0 Training and Communication**

The company will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

The company's ethical trading and modern slavery policy and zero-tolerance attitude will be clearly communicated to all clients, suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

## **10.0 Monitoring and Reviewing**

The company's operations manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the operations manager.

## **12.0 Applicability of Other Policies**

This document is part of the company's cohesive set of security policies. Other policies may apply to the topics covered in this document and as such the applicable policies should be reviewed as needed.

## **13.0 Enforcement**

This policy will be enforced by the Operations Manager. Breaches may result in disciplinary action, which may include the termination of the relationship with a supplier.

Where illegal activities are suspected, the company may report such activities to the applicable authorities.