



MODERN SLAVERY POLICY

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Why we have this Policy

Callidus Roe runs its activities with integrity. Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it is not. At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation, makes good business sense. This Policy is integral to that effort, and we are all, bound by it.

The Modern Slavery Act 2015 (MSA) recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

our supply chain

- any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- cleaning and catering suppliers
- corporate hospitality; and
- suppliers of any of our merchandise.

Callidus Roe's reputation is one of our key assets. It is a trusted brand. Any allegation of improper conduct can damage it, making it difficult for us to engage with other companies, government departments, and corporate partners. Therefore, it is vital that our business practices are ethical and transparent.

In addition, the MSA requires organisations to publish a transparency in supply chains statement (TISC Statement) in their annual accounts from the 2016 financial year onwards, stating what measures they have taken to check whether there is any modern slavery in their supply chains.

Accordingly, we have issued this Policy to help the Callidus Roe, our managers, and staff to meet their responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity, and to enable Callidus Roe to make a TISC Statement in its annual accounts.

Who this Policy relates to

This Policy applies to all. Everyone must observe this Policy and be aware that turning a blind eye is unacceptable and simply not an option.

Other documents you need to read in relation to this Policy

You should also read Callidus Roe's:

- Anti-Bribery and Corruption Policy
- Conflicts of Interest Policy
- Expenses and Travel Policy;

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- Whistleblowing Policy
- New Supplier Form.

Overview of this Policy

We have procedures in place to check our supply chains.

We will make a clear Transparency in Supply Chains (TISC) Statement each year.

The Policy itself

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 using 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

This policy covers all four activities.

Callidus Roe

We will:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- be clear about our recruitment policy (see Recruitment)
- check our supply chains (see Supply chains)
- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- ensure we 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 a clear statement that we take our responsibilities to our employees and our clients seriously (see Modern Slavery statement)

Senior staff

This group of people will:

- listen and be approachable to colleagues
- consider what action might be appropriate if they are told something that might indicate

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a colleague is in an exploitative situation

- remain alert to indicators of slavery (see Identifying slavery)
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- use their experience and professional judgement to gauge situations

Colleagues

- We all have responsibilities under this policy. Whatever your role or level of seniority you must:
- keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill- treated
- tell us if you think there is more, we can do to prevent people from being exploited

What happens if you do not follow this Policy

The principal areas of risk we face, related to slavery and human trafficking, include:

- supply chains
- recruitment through agencies
- corporate hospitality; and
- supply of our merchandise.

We manage these risk areas through our procedures set out in this policy.

Our procedures

Modern Slavery statement

We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

We make this statement on our website and as part of our company reporting.

This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

Supply chains

We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

We tell the companies we do business with that we are not prepared to accept any form of exploitation.

Going forwards, all our supplier contracts will contain an modern slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking.

Recruitment

Using agencies

- Our HR department follows Callidus Roe policy and only uses reputable recruitment agencies

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes, where appropriate, ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- We keep agents on the list under regular review, at least every 3 years.

General recruitment

- We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We always ensure staff are legally able to work in the UK.
- We provide information to all new recruits on their statutory rights including sickpay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (see Reporting slavery).

Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim

- the person is not in possession of their own passport, identification or travel documents
- the person is acting as though they are being instructed or coached by someone else
- they allow others to speak for them when spoken to directly
- they are dropped off and collected from work
- the person is withdrawn, or they appear frightened
- the person does not seem to be able to contact friends or family freely; or
- the person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display several the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

Reporting Slavery

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999.

Otherwise, you should discuss your concerns with Callidus Roe's head of HR, who will decide a course of action and provide any further advice.

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 an immediate danger, you discuss your concerns first with the Director of HR before taking any further action.

Training

We provide training to those staff members who are involved in managing recruitment and our supply chains.

Monitoring our procedures

We will review our Modern Slavery policy regularly, at least every 2 years. We will provide information and/or training on any changes we make.

What happens if you do not follow this Policy

If there is slavery in any part of Callidus Roe's supply chain, there is clearly a detrimental impact on the victims. In addition, Callidus Roe itself may face censure, our reputation will suffer, and it's likely that organisations we work with, such as government departments and businesses, will no longer want to work with us.

Staff members who flout this Policy may find themselves subject to disciplinary action.

A failure to follow this policy could result in an incident that may need reporting to a regulatory body. Please see <https://www.gov.uk/government/collections/modern-slavery> for guidance on what constitutes a serious incident and discuss with the Head of HR.

Queries and Comments

If you have any queries regarding how this Policy works in practice, or comments or suggestions as to how it could be improved, please contact your manager.

Effectiveness Tracking

For the financial year 2025 we have identified the following KPI:

- review third party contractors' arrangements and work with them to seek to ensure that their working practices prevent human rights abuses and modern slavery; and

Appendix A

Control Sheet

Modern Slavery Policy

Sponsor: Mike Tilsley
Document reviewer: Management Team
Document adopted on: 1 February 2017
Next review date: 3 May 2027

Review/change history

Date of Review/Change	Summary of changes	Version no.
February 2017	First Version	1.0
February 2019	No changes	1.0
December 2019	Transferred into new policy template	1.1
February 2020	No Changes	1.1
February 2021	Addition of reference to serious incident reporting	1.2
February 2023	Addition of effectiveness tracking	1.3
May 2025	Minor typo changes and title change from Anti-Slavery	1.4