

# Modern Slavery Policy

## Introduction

This Policy sets out the steps CCL will take to comply with the Modern Slavery Act 2015 and our commitment to acting ethically and with integrity in our organisations relationships across the UK and internationally. In addition, we are implementing processes to ensure that our systems and controls are effective in ensuring that slavery is not taking place in our supply chains.

The aim of this policy is the prevention of opportunities for modern slavery to occur within the organisation or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). The Act is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. Modern slavery can occur in various forms, including servitude, forced or 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.

We operate a number of policies which reflect our commitment to acting properly in all of our organisational relationships and to implementing and enforcing effective systems and controls. Our policies which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include our:

- **Dignity at Work Policy**
- **Whistleblowing Policy**
- **Code of Conduct Policy**

We will continue to review our policies to ensure that they are effective and appropriate. Subject to changes in legislation, this Policy will be reviewed and updated accordingly.

Slavery can take many forms. These include:

- Child trafficking
- Forced labour
- Forced marriage
- Sexual exploitation
- Criminal exploitation
- Domestic servitude
- Labour exploitation
- Organ harvesting

CCL will not tolerate slavery in any aspect of our organisation. We hold our supply chains and ourselves accountable, and we will ensure compliance with the provisions of the Modern Slavery Act 2015 in relevant aspects of our work.

## Policy Outline

This Policy provides an overview of our zero-tolerance approach to modern slavery. We assess risks across supply chains and have amended our procedures to ensure that our contractors, consultants, suppliers, and downstream partners (who directly implement our projects), in areas where a potential risk may occur, actively work towards eradicating modern slavery.

## Our Supply Chains

Due to the nature and geographical reach of our organisation, procurement across the organisation is a hybrid structure of central and decentralised procurement activity.

The Procurement Strategy and high value and high-risk opportunities are facilitated centrally by the **Head of Business Operations**, with the remainder carried out by operational and international employees.

## Our Approach

To mitigate risk within our supply chains, we have implemented and communicated the following systems and controls:

United Kingdom Operations will:

- Identify and assess potential risk areas in our UK supply chains by conducting an organisation wide spend and risk analysis
- Mitigate the risk of slavery in our supply chains by being open with suppliers on how we work together
- Ask third party providers for a copy of their Modern Slavery policy or statement. Where this is not available, we will ask third party providers to read and comply with the CCL Modern Slavery policy. This is carried out at the onboarding stage of all new suppliers.

Overseas Operations will:

- Share the Modern Slavery Policy with our partners and suppliers
- Create guidance with our venue teams and partners on how to assess potential risks in our supply chains and contractors
- Include cross-checking mechanisms when CCL staff interact with suppliers.

## Risk Management

As CCL operates in the UK and internationally, we have identified that we do have a potential exposure to risk. However, our Modern Slavery Policy and policies around recruitment and procurement ensures that we have effective controls in place. Staff are encouraged to 'speak up' through our whistleblowing and confidentiality policies.

To manage this risk, we will work with suppliers and contractors to acknowledge our commitment to combat slavery by inserting relevant clauses into our contracts and agreements.

## Training and Awareness Raising

To ensure a high level of understanding of the risks of modern slavery, we annually review awareness and training. The training will be made available to all staff in 2025. This is aimed at helping employees to better understand the risks and how we as an organisation are working to manage this and mitigate Modern Slavery.

## How to Report Modern Slavery Concerns

Employees who suspect incidents or signs of modern slavery in the UK should:

- In the first instance, all modern slavery crimes should be reported to the local police by dialling 999.
- If employees hold information that could lead to the identification, discovery, and recovery of victims in the UK, they should contact the Modern Slavery Helpline 0800 0121 700.
- For more information, employees are advised to visit: [www.unseenuk.org](http://www.unseenuk.org)
- Alternatively, employees can make calls anonymously to Crimestoppers on 0800 555 111.

Employees who suspect incidents or signs of modern slavery internationally should:

- Contact Anti-Slavery International at: [www.antislavery.org/contact-us/](http://www.antislavery.org/contact-us/) or other specialist anti-slavery organisations.
- Search online for the relevant helpline in their country. If employees are abroad and think a person may be being exploited or have been trafficked, they should contact the embassy or consulate in the first instance for support.