

# CAST COMMERCIAL ACUMEN LIMITED

## Modern Slavery Policy

### 1. Introduction

- 1.1. This Policy sets out the steps Cast Commercial Acumen Limited (“CAST”) will take to comply with the Modern Slavery Act 2015 and our commitment to acting ethically and with integrity in our organisations relationships and work across the UK and internationally.
- 1.2. This document sets out CAST’s policy with the aim of the prevention of chances 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.
- 1.3. 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.
- 1.4. From 29 October 2015, the Transparency in Supply Chain Provisions (source: Modern Slavery Act, 2015, Section 54(1), requires businesses to ‘publish an annual statement if they have an annual turnover above a threshold of £36 million’. Even though CAST is a company whose turnover is far less than this threshold, we have made a Modern Slavery Statement to demonstrate our commitment to honouring every persons fundamental human rights.
- 1.5. CAST’s statement is made to ensure that slavery and human trafficking are not taking place in the organisation (or in any supply chain).
  - 1.5.1. The statement is published and reviewed annually on our website at <https://www.castcommercialacumen.co.uk/companyolicies>
- 1.6. 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:
  - Harassment & Anti-bullying policy
  - Whistleblowing policy
  - Diversity, Equity & Inclusion policy
  - Supplier Diversity policy
  - Communication policy
  - Teaching & Learning policy
- 1.7. 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.

1.8. Slavery can take many forms. These include:

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

1.9. CAST 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.

## 2. Scope of the Policy

2.1. This policy document 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.

## 3. Our Approach

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

- Identify and assess potential risk areas in our UK supply chains by conducting an organisation wide 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 CAST Modern Slavery policy. This is carried out at the onboarding stage of all new suppliers.
- Include our Modern Slavery clause in all Contracts.

3.2. When we work internationally, we will:

- Share the Modern Slavery Policy with our customers, partners, and suppliers.
- Create guidance with our regional teams and partners on how to assess potential risks in our supply chains and contractors.

- Include cross-checking mechanisms when CAST team members interact with suppliers and clients.

#### **4. Risk Management**

- 4.1. CAST operates primarily in the UK, but as we expand our services internationally, there is a potential increase in exposure to risk. However, our Modern Slavery Policy and abovementioned policies ensures that we have effective controls in place. Team members are encouraged to 'speak up' through our whistleblowing and communication policies.
- 4.2. 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.

#### **5. Training and Awareness**

- 5.1. Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.
- 5.2. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **6. How to Report Modern Slavery Concerns**

- 6.1. Team members 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 team members 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, team members are advised to visit: [www.unseenuk.org](http://www.unseenuk.org)
  - Alternatively, team members can make calls anonymously to Crimestoppers on 0800 555 111.
- 6.2. Colleagues who suspect incidents or signs of modern slavery internationally should:
  - Contact Anti-Slavery International at: <https://www.antislavery.org/contact-us/> or other specialist anti-slavery organisations.
  - Search online for the relevant helpline in their country. If colleagues 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.

## 7. Monitoring, Review and Performance Information

7.1. The monitoring and effectiveness of this policy will be managed by Clayton John Ainger, which includes:

- Recording and monitoring any incidents or reports made to us which conflict with our values.
- Treating all reports and incidents in line with our confidentiality policy.
- Reviewing and strengthening our centralised procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.

## 8. Breaches of this policy


8.1. Any team member who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

8.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## 9. Policy Review and Implementation

9.1. This Policy will be updated as necessary to reflect current best practice, official guidance, and in line with current legislation.

9.2. This Policy shall be deemed effective as of 13th April 2023. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

<b>Document title:</b>	Modern Slavery Policy
<b>Document status:</b>	Final
<b>Version number:</b>	1.0
<b>Date:</b>	April 2023
<b>Review date:</b>	April 2025
<b>Owner:</b>	Managing Director
<b>Approved by:</b>	Clayton John Ainger
<b>Signature:</b>	

**This Modern Slavery Policy is not contractual and may be varied by Cast Commercial Acumen Limited at any time.**