

Modern Slavery Policy

Document Approval

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Document Revision History

Version	Date Issued	Date Effective	Purpose of issue and description of amendments
1.0	19/12/2020	19/12/2020	Original
2.0	01/02/2021	01/02/2022	Revision
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Policy Statement

Modern slavery is a crime and 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. Corndel has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in the company or supply chain. Corndel undertakes to remain compliant with the Modern Slavery Act 2015.

Corndel expects the same high standards from all its contractors, suppliers, key stakeholders and other business partners. As part of the company's contracting processes, Corndel includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and expects that its suppliers will hold their own suppliers to the same high standards.

This policy does not form part of any employee's contract of employment and Corndel may amend it at any time.

Slavery and Human Trafficking Statement

Corndel falls within s.54 Modern Slavery Act 2015, making it the company's obligation to prepare a slavery and human trafficking statement for each financial year. This policy serves to do the same and is renewed annually. The policy outlines how Corndel prevents slavery and trafficking in its supply chain and within its business and hereby confirms that the same has been performed in the previous financial year.

Scope

This policy applies to all people working for Corndel, or on Corndel's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Responsibilities

The People team (HR) has overall responsibility for ensuring this policy complies with Corndel's legal and ethical obligations, and that all those under Corndel's control comply with it. The People team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Policy and Practice

Introduction

Employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of Corndel's business or supply chain is the responsibility of all those working for Corndel or under Corndel's control.

Reporting Suspicions of Modern Slavery

Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. They must notify their line manager or the People team (hr@corndel.com) as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any part of Corndel's business or the supply chains of any supplier tier at the earliest possible stage.

If employees believe or suspect a breach of this policy has occurred or that it may occur, they must notify their line manager or report it in accordance with Corndel's Whistleblowing Policy as soon as possible.

If employees are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Corndel's supply chain constitutes any of the various forms of modern slavery, they should raise it with their line manager or the People team (hr@corndel.com).

Corndel aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Corndel is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of Corndel's own business or any part of its supply chain. If employees believe that they have suffered any such treatment, they should inform their line manager immediately.

The People team will then use the procedure under 'General Recruitment' to deal with this report, after having carried out its own initial investigation.

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 check the names and address of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the People team will follow the following procedure:

1. Report this matter to the CEO.
2. Call the Modern Slavery Helpline on 08000 121 700 to report the alleged slavery or contact the police on 999 where there is a risk that the individual in question is in immediate danger.
3. Keep a log of the report.

Anyone within the Company recognising modern slavery must be careful to keep matters as confidential as possible and only speak to those that they must report the issue to, to ensure that risk towards the affected individual is not increased.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

1. annual review of our Modern Slavery Policy.
2. identify modern slavery risks where relevant and consider which parts of the company's supply chain are most vulnerable – due to the nature of our business, we assess ourselves to have a low risk of modern slavery as we operate a short supply chain.
3. contractual requirement for all customers/clients/subcontractors (if used) to comply with the Modern Slavery Act 2015 and have a Modern Slavery policy in place, to be presented upon request; and

4. modern slavery training for staff, so that everyone can identify any signs of modern slavery within the business and be aware of how to report this.

Breaches of this Policy

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

Corndel may terminate its relationship with other individuals and organisations working on Corndel's behalf if they breach this policy.

Support

Training in this policy, and on the risk Corndel faces from modern slavery in its supply chain will be given where needed.

Corndel's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of its business relationship with them and reinforced as appropriate thereafter by our account managers and Business Development team.