

## Anti-slavery and human trafficking policy

### Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Codel International strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

### Commitments

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the Company or under its control.
- Appropriate due diligence processes must be carried out in relation to modern slavery which may include considering human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- All supply chain lines need to be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited. The Company's standard procurement and contract documentation addresses anti-slavery and anti-trafficking.
- The Company encourages anyone to raise any concerns about modern slavery, using its whistleblowing policy if necessary, and will support anyone who acts in good faith.
- The Company's recruitment policy and processes support efforts to combat modern slavery and human trafficking.
- The Company will continue to develop its commitment to combat modern slavery and human trafficking and will outline such activities within its annual anti-slavery and anti-trafficking statement.

Any breaches of this policy may result in the Company taking disciplinary action against individual(s) and/or terminating its relationship with any organisation or supplier.

Signed: .....



General Manager  
Date 9<sup>th</sup> Sept 2019

Signed: .....



General Manager  
Date 9<sup>th</sup> Sept 2019