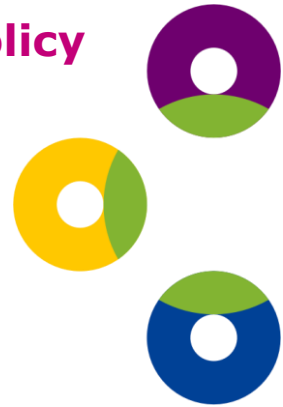


# CPP Group

## CPP Group Plc: Anti-slavery and Human Trafficking Policy



**Date of Issue:** September 2022  
**Version Number:** V5.0  
**Sponsoring Executive:** Simon Pyper  
**EMC Approval:** 20<sup>th</sup> September 2022  
**Classification:** Confidential

### Document Control

The information contained herein is the property of CPPGroup Plc and may not be copied, used or disclosed in whole or in part except with the prior written permission of CPPGroup Plc.

### Approval & Review Period:

EMC approval is required for changes to this policy, with material changes (as determined by the EMC) requiring CPPGroup plc Board approval.

This policy will be reviewed when there are material changes in the nature of areas being covered, the business's strategic direction or operational plans. As a minimum the policy will be reviewed at least annually.

### Revision History

Date Issued:	Version No.	Reason for Change:
October 2016	V1.0	Original
March 2018	V2.0	Annual review
September 2020	V3.0	Annual Review
September 2021	V4.0	Annual Review
September 2022	V5.0	Annual Review

## **1. Policy Statement**

- 1.1 Modern slavery is a crime and a 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. CPPGroup Plc ("CPP or "the Group") has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 CPP is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from our contractors, suppliers and other business partners. Where relevant based on a risk assessment, we include anti-slavery and human trafficking obligations in our contracts as part of our contracting processes, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for CPP or on its behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party representatives.
- 1.4 This policy does not form part of any colleague's contract of employment and may be amended at any time.

## **2. Responsibility for the policy**

- 2.1 The CPP Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Group HR Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it.
- 2.3 Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and, if appropriate, are given training on the issue of modern slavery in supply chains.

### **3. Compliance with the policy**

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.4 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Group HR Director OR report it in accordance with the Group Whistleblowing Policy as soon as possible.
- 3.5 If you are unsure about whether a particular act, the treatment of individuals more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Group HR Director or through the confidential helpline, Westfield Health on 0800 092 0987 **(please note that the helpline is not available to colleagues outside of the UK)**.
- 3.6 CPP 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. We are 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group HR Director immediately. If the matter is not remedied, and you are a colleague, you should raise it formally using your local Grievance Procedures, which can be found on the Group intranet.

### **4. Communication and awareness of the policy**

- 4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for individuals employed in roles that are deemed to be 'high risk', and regular training will be provided to those individuals as necessary.

- 4.2 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.

## **5. Breaches of the policy**

- 5.1 Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 CPP may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.