

Modern Slavery and Human Trafficking Policy

This Policy takes into account, and supports, the policies and procedures documented in our Management Systems, compliant with our quality management accreditation. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Measures are in place ensure that this policy is understood and communicated to all personnel who are involved in hiring, purchasing or appointing sub contractors. This Policy is to be reviewed annually.

Contraflow Limited is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including subcontractors. The Company acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

1.1 Basic Standards of Conduct

- (a) As part of the Company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.
- (b) Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.
- (c) The Company will not support or deal with any business knowingly involved in slavery or human trafficking.

1.2 Employees

- (a) The Company Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.
- (b) A copy of this policy will be accessible to all employees electronically and can be obtained from the HR department upon request. The policy will be communicated annually by e mail to all staff with hiring, purchasing or selection of subcontractor / supplier responsibilities.

1.3 Risk of Modern Slavery

- (a) Contraflow purchases equipment from many UK suppliers and distributors. If there is deemed to be a risk of slavery or human trafficking within the supply chain Contraflow will assess the supplier's suitability to remain on the approved purchase list. Contraflow assess any potentially suppliers deemed to be at risk (i.e. clothing suppliers) by ensuring that they are assessed to the Ethical Trading Standards (ETI) initiative.
- (b) Suppliers are checked annually to identify the risk of modern slavery/human trafficking.

1.4 Training

Staff are aware of this policy and contents. All purchases within the company are controlled by the buyer who assesses the risk associated with suppliers.

Signed 
Position Managing Director
Date 08 October 2020