

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 2023

Modern Slavery and Human Trafficking Transparency Statement (2022-2023)

Statement from the Managing Director, John MacDonald

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. We are committed to improving our practices to combat slavery and human trafficking.

Whilst Contraflow is not obligated by law to produce a statement around Modern Slavery & Human Trafficking, I believe the business has a moral obligation to make written commitments around the subject matter and provide detail as to how we mitigate any risk of involvement with third parties who partake in any such abhorrent practices. We take this subject matter seriously and we have created a number of processes that demonstrate our commitment to preventing slavery and human trafficking throughout our operations and where possible with third parties we work with.

From our initial recruitment process to ongoing training and development of our teams, we promote transparency and fairness throughout our performance management framework and it is the promotion of moral courage that underpins our service delivery in all aspects, not just in relation to this matter.

Further to, and in support of the below information, Contraflow has a Modern Slavery and Human Trafficking policy which can be made available at request to appropriate parties.

Organisational structure

We are a provider of Traffic Management Services. We operate out of 4 Depots in Scotland and have a headcount of less than 100.

Our supply chains

We intend to carry out a supply chain mapping process to include a risk assessment where appropriate. This project will ensure that, within reasonable expectations we are ensuring that there is no risk of Contraflow working with suppliers that fail to meet the basic obligations as detailed in the Modern Slavery act of 2015.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Modern Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Company Directors and Senior Management take responsibility for implementing the 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.

A copy of the policy is accessible to all employees electronically and can be obtained from the HR department upon request. The policy is communicated annually by e-mail to all staff with hiring, purchasing or selection of subcontractor / supplier responsibilities.

1.1 Basic Standards of Conduct (as detailed in our full policy)

- (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.*

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we are constantly evaluating current process – this is an ongoing cycle of operational self-betterment. In addition, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. All purchases within the company are controlled by the buyer who assesses the risk associated with suppliers. 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. Suppliers are checked annually to identify the risk of modern slavery/human trafficking.

To ensure all those in our supply chain and contractors comply with our values we initiated a project to have in place a supply chain compliance programme which, depending on circumstances, will include:

- Audit
- Training
- Supplier clauses

This project is being led by our newly appointed 'Compliance Specialist' who is coordinating efforts across the Operations of the business in consultation with our legal representation.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Staff are aware of our policy and contents

Our effectiveness in combating slavery and human trafficking

We have appointed an independent third party, HR Consultancy, to conduct an externally facilitated review to bring insights on ways to we can tackle slavery and human trafficking.

Further Steps

Our 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.

Signed
Position
Date



Managing Director
8 October 2023