MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Last reviewed: 3rd July 2026

CONTRAFLOW LTD.
the standard for safety, service and support

PURPOSE & SCOPE

This Policy takes into account, and supports, the policies and procedures documented in the Company's Management Systems, compliant with its quality management accreditation. It applies to all personnel involved in hiring, purchasing, or appointing subcontractors, and extends to the Company's supply chains.

POLICY STATEMENT

The Company is committed to driving out acts of modern-day slavery and human trafficking within its business and supply chains, including subcontractors. The Company acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to ensuring transparency both within the organisation and with suppliers of goods and services. The Company will not support or knowingly deal with any business involved in slavery or human trafficking.

PRINCIPLES / REQUIREMENTS

Basic Standards of Conduct:

- The supplier approval process will include due diligence to assess the risk of slavery and human trafficking.
- Additional controls will be applied to goods imported from outside the UK and EU, recognising higher associated risks.
- The Company will not engage with organisations known to be involved in slavery or human trafficking.

Employees:

- The policy will be communicated annually to staff involved in hiring, purchasing, or subcontractor selection.
- A copy of the policy will be accessible electronically and via the HR department.
- Employees raising concerns will be protected under the whistleblowing policy.

Risk of Modern Slavery:

- Suppliers are assessed annually to identify risks of modern slavery and human trafficking.
- Where risks are identified, the Company will review supplier suitability for the approved supplier list.
- Higher-risk suppliers (e.g., clothing suppliers) will be required to supply their Modern Slavery and Human Trafficking Policy and / or be assessed against Ethical Trading Initiative (ETI) standards.
- Selected suppliers will receive communication outlining the Company's commitment to ethical trading and expectations.

RESPONSIBILITIES

- **Company Directors and Senior Management:** Responsible for implementing this policy and its objectives, and for providing adequate resources, including training and investment, to ensure that slavery and human trafficking do not occur within the organisation or its supply chains.
- **Employees**: Must comply with this policy and are encouraged to report any concerns regarding modern slavery. Staff are protected under the whistleblowing policy when raising concerns.
- **HR Department:** Responsible for ensuring the policy is accessible to all employees and available upon request.
- **Personnel involved in hiring, purchasing, and subcontractor selection:** Must understand and apply the policy, including supplier due diligence and ethical considerations.

DELIVERY & COMPLIANCE MONITORING

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

This policy will be formally reviewed annually, though on exception amendments may be implemented at other times as required by changes to legislation or work practices.



John MacDonald
Managing Director