

## Anti-slavery and Human Trafficking Policy

### Crown Worldwide Limited

Crown Worldwide Limited and its subsidiaries maintain relationships with many different organisations in its supply chain, as well as employ people directly. In light of the general UK law on employment and human rights, and more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or supply chain. This Policy underpins our approach and will be used to inform our Statement on Slavery and Human Trafficking.

Our adopted statement on the prevention of modern slavery and human trafficking governs all of our business dealings and the conduct of persons or organisations with whom we contract directly/appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with Crown or any member of our company to familiarise themselves with our anti-slavery values and to act at all times according to our Anti-slavery and Human Trafficking Policy.

### Our statement:

Crown Worldwide Limited operate to a set of values that reflect how we behave. In reference to the Modern Slavery Act 2015, we are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand this of all who work for us and expect it of all we have business dealings. Our attitude to modern slavery is zero tolerance.

Crown Worldwide Group (our parent company) is a member of the UN Global Compact (UNGC) – the world's largest corporate citizenship and sustainability initiative. Companies, governments and other organisations worldwide recognise this continued membership.

Maintaining our membership has required the United Nation's approval of our annual Sustainability Report and our Chairman's formal commitment to the UNGC's ten principles. The principles cover human rights, labour, environment and anti-corruption. We have set goals in each of these areas and will publicly report on our progress annually.

## 1. Purpose of the Policy

- 1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking – all of which deprive a person's liberty and exploit them for personal or commercial gain. This document sets out the Policy Crown Worldwide Limited adopts to prevent modern slavery opportunities from occurring within its businesses or supply chain. This Policy's use of the term "modern slavery" has the meaning given in the Act.
- 1.2 As a company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all of our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

## 2. Modern slavery prevention steps

- 2.1 We are committed to ensuring there is transparency in our business and approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. We are always evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude (adults or children). We expect our suppliers to hold their own suppliers to the same high standards.
- 2.2 All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this Policy forms part of all employees' obligations under their contract of employment and employee Code of Conduct Policy.
- 2.3 Employees are also encouraged to undertake the Company's Modern Slavery Course found on our internal e-learning system, iLearn.

While recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain.

### 3. Responsibility for the Policy

- 3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's Senior Leadership Team. The Directors of the Company have overall responsibility for ensuring this Policy and its implementation comply with our legal and ethical obligations.
- 3.2 Managers at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate guidance on the issue of modern slavery.

### 4. Reporting modern slavery or human trafficking

- 4.1 The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. All employees may report concerns about suspected modern slavery associated with the Company or its suppliers in this manner.

The Whistleblowing Procedure may be found in the employee Code of Conduct Policy available on the Company's SharePoint site. The nature of the complaint will determine the Company's next course of action.

### 5. Suspicious activity

The Company must be made aware of any suspicious activity immediately via the [Ethics and Compliance Hotline](#) found on SharePoint.

The following circumstances must be reported through the Ethics and Compliance Hotline:

- You suspect a person acting on behalf of Crown Worldwide Limited is seeking to exploit another in a way that could amount to modern slavery
- You suspect a person acting on behalf of one of our suppliers is seeking to exploit another in a way that could amount to modern slavery
- A person acting on behalf of Crown Worldwide Limited, or a supplier, has invited you to participate in acts that could result in offences under the Modern Slavery Act 2015 being committed
- You have information that leads to the rational conclusion that a person acting on behalf of Crown Worldwide Limited, or a supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015



The source of reports will be kept confidential, except in cases that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery.

## 6. Direct communication

The Company encourages non-Crown employees and members of the public to write, in confidence, to the Head of Compliance, c/o Heritage House, 345 Southbury Road Enfield, Middlesex EN1 1TW, to raise any concern, issue, or suspicion of modern slavery in any part of our business, or related supply chain.

## 7. Safeguards

We aim 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 person suffers any detrimental treatment as a result of reporting their suspicion that modern slavery is, or may be, taking place in any part of our business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take concerns communicated anonymously very seriously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made that are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

## 8. Communication and awareness of this Policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

## 9. Review

Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed on an annual basis and may be amended from time to time. This Policy will be used to inform on our Statement on Slavery and Human Trafficking.

Signed.....

Stephen Hardie Managing Director UKINE

Date.....  
*16/10/2019*