

MODERN SLAVERY & HUMAN TRAFFICKING & ILLEGAL WORKING POLICY

Introduction

The statement sets down CR Reynolds Limited's commitment to preventing slavery, human trafficking and illegal workers in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery, human trafficking or illegal workers in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Training

To ensure a good understanding of the risks of modern slavery, human trafficking and illegal workers in our business and supply chains, staff will attend training regarding identifying and reporting modern slavery, human trafficking, and illegal workers. This training is delivered as part of the staff induction.

Policy

CR Reynolds Limited is committed to ensuring that there is no modern slavery, human trafficking or illegal workers in our business or our supply chains. This Statement affirms our intention to act ethically in our business relationships.

Illegal Workers

CR Reynolds Limited undertake appropriate VISA, Passport and DOB checks to ensure all employees working on behalf of the company are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006. Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment with the company.

Checks and controls will include all agency workers, self-employed, subcontracted personnel, as necessary. In addition, periodic reviews for right to work of all workers including agency temporary and seasonal employees will take place.

Due Diligence Processes for Slavery and Human Trafficking

CR Reynolds Limited undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes the building of long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier &/or invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request. This policy statement will be reviewed annually and published.



Signed:
Print: Chris Reynolds
Position: Managing Director/CEO
Dated: 31/05/2024