

Modern Slavery Policy

Why This Matters

At CC33 Global Limited (CC33), we are committed to creating a fair, ethical, and transparent working environment. Although the Modern Slavery Act 2015 does not mandate that we publish a Modern Slavery Policy, we firmly believe that it is our responsibility to ensure that all our operations, and those of our suppliers, are free from human trafficking, forced labour, and child exploitation. By publishing this policy, we aim to demonstrate our ongoing commitment to high standards of corporate governance and social responsibility.

Background

In accordance with the Modern Slavery Act 2015, CC33 is committed to a work environment that is free from human trafficking, forced labour, and unlawful child labour (collectively “human trafficking and slavery”). We also firmly believe in promoting ethical and lawful employment practices.

Accordingly, CC33 will not knowingly use unlawful child labour or forced labour in any of the services it provides, nor will it accept commodities, products, and/or services from suppliers that employ or utilise child labour or forced labour.

Rationale

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries around the world. This policy defines CC33’s commitment to ensuring that human trafficking and slavery do not exist within our business. It outlines how we aim to eliminate these practices in businesses we maintain relationships with, particularly within our supply chain.

CC33 has appointed its Managing Director as the senior compliance officer (Anti-Slavery and Human Trafficking Officer). It will take the necessary steps to ensure not only our compliance but also that of our suppliers, subcontractors, and/or business partners worldwide.

Definitions

- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons, by means of force, coercion, abduction, fraud, deception, abuse of power, or vulnerability for exploitation.
- **Forced Labour:** All work or service not voluntarily performed, obtained from an individual under threat of force or penalty.
- **Harmful Child Labour:** The employment of children that is economically exploitative, hazardous, interferes with their education, or harms their health or development.

Requirements for Suppliers

Suppliers must adhere to the following:

- **No Forced or Compulsory Labour:** Suppliers will not use any form of forced or compulsory labour, i.e., any work performed involuntarily under threat of penalty.
- **Voluntary Employment:** Suppliers will ensure that employment terms are voluntary and comply with legal standards regarding age requirements.
- **Fair Compensation:** Suppliers will compensate workers with wages and benefits that meet or exceed legal requirements and comply with overtime pay requirements.
- **Work Hours:** Suppliers will abide by laws concerning the maximum hours of daily labour.

- **No Slavery or Human Trafficking:** Suppliers will not engage in any practice of slavery, servitude, forced labour, compulsory labour, or human trafficking in the UK or outside the UK.
- **Subcontractors and Supply Chain:** Suppliers will ensure that any subcontractors or suppliers they work with also adhere to these requirements.

Certification

Suppliers must certify compliance with this policy and adhere to relevant human trafficking and slavery laws in each country where they operate.

Audits

Upon request, suppliers must demonstrate compliance with this policy to CC33's reasonable satisfaction. CC33 may conduct periodic audits, and suppliers must fully cooperate with these audits.

Reporting

Any breach of this policy, including by a supplier, can be reported confidentially to Group Business Governance compliance@cc33.co.uk

Consequences

CC33 takes any breach of this policy very seriously:

- **Termination of Contracts:** Suppliers found engaging in human trafficking, slavery, or refusing to cooperate with audits will have their supply agreements terminated immediately, without compensation.
- **Remedial Actions:** If a supplier is found in violation, CC33 will take prompt action, including terminating agreements and implementing corrective measures to address and prevent reoccurrence.