



## Anti-Slavery, Human Trafficking and Illegal Workers Policy

This policy applies to all persons working for CA Group at all levels.

CA Group strictly prohibits the use of modern slavery and human trafficking within our company. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation. We expect that our suppliers will hold their own suppliers to same standards.

Modern Slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

As an employer, CA Group have a legal responsibility to prevent illegal working in the UK. The Immigration, Asylum and Nationality Act 2006 places the requirement for all employers to conduct basic document checks on every person that they intend to employ. By undertaking the document checks we can be reassured we are complying with our legal obligations and are doing everything possible to only employ people who are allowed to work in the UK. So long as these document checks are carried out we have a 'statutory excuse' against legal liability should it later turn out that one of our employees is not entitled to work in the UK. CA Group will be compliant with the "Home Office Guidance for Employers on Preventing Illegal Working" and carry the right document checks to verify all workers legally have the right to work in the UK; we request the following documents to be provided as evidence:

- UK Passport
- Certificate of Registration/ Along with an official document/letter from HMRC or another government body with name/ NI number and address on it.
- Naturalisation Certificate
- VISA
- Pre-Settled or Settled Status

All copies of all documents verified are retained for at least 2 years after the individual has left the employer.

CA Group will be a company that expects everyone employed by us working for us will support and uphold the following measures to safeguard against modern slavery:

We have a zero-tolerance approach to modern slavery in our organisation and abide by the Modern Slavery Act 2015.

The prevention, detection and reporting of modern slavery in any part of our organisation

workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations.

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts.

Consistent with our risk-based approach we require employment identification through the proof of passports.

If we find that employees or suppliers working on our behalf have breached this policy, we will ensure that we take appropriate action which could lead to the terminating of contracts.

THIS POLICY WILL BE REVIEWD ON AN ANNUAL BASIS

James Amos, Managing director of CA Group  
31st May 2023