

Cavagna Group UK Ltd: Modern Slavery Policy

Policy Statement

Cavagna Group UK Ltd is committed to preventing modern slavery and human trafficking in our operations and supply chain. We recognise our responsibility to uphold human rights and ensure that all individuals are treated with dignity and respect. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any supply chains.

We expect the same high standards from all our contractors, suppliers and other business partners.

Purpose

This policy outlines our commitment to combat modern slavery and to provide a framework for identifying and mitigating risks associated with modern slavery in our business activities.

Scope

This policy applies to all employees, contractors, and third parties engaged by Cavagna Group UK Ltd, including suppliers and business partners.

Definition of Modern Slavery

Modern slavery encompasses a range of exploitative practices, including forced labour, human trafficking, debt bondage, child labour and involuntary servitude and other forms of coercion (“Modern Slavery”). It violates fundamental human rights and has no place in our business or supply chain.

Responsibilities for the policy

Our company has overall responsibilities for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Cavagna Group UK Ltd has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, detailing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of Modern Slavery in the supply chains.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

The employees of Cavagna Group UK Ltd must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all employees. The employees are required to avoid any activity that could possibly lead to, or suggest, a breach of policy. If employees believe or suspect that a conflict with this policy has occurred or may occur in the future, they are encouraged to inform their manager or director as soon as possible. All employees are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of this policy has occurred or may occur, he/she must notify his/her line manager or company director or report in accordance with our whistle blowing policy as soon as possible.

If an employee believes they have been treated in this way, they should inform their line manager immediately. If the issue is not resolved, the employee has the option of reporting the problem formally using our grievance procedure, which can be found in the current S:\Company UK\HR Policy & Procedures file.

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 one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If an employee believes that they have suffered any such detrimental treatment, he/her should inform his/her line manager immediately. If the matter is not remedied, the employee should raise it formally using our grievance procedure, which can be found in the current HR policy and procedure file S:\Company UK\HR Policy & Procedures.

This (Anti) Modern Slavery Policy is intended for the company Cavagna Group UK Ltd.

Commitments

- We comply with the Modern Slavery Act 2015 and relevant legislation to prevent and address Modern Slavery.
- We conduct regular assessments of our operations and supply chains to identify and evaluate the risk of Modern Slavery.
- We ensure transparency in our supply chains.
- We require our suppliers to adhere to our standards and ethical practices. This includes a commitment to ensuring that their own supply chains are free from Modern Slavery.
- We provide training for employees to raise awareness of Modern Slavery, enabling them to identify and report any concerns.
- We promote a workplace culture that supports human rights and ethical labour practices.
- We have established clear channels for employees to report suspected incidents of Modern Slavery. Reports will be taken seriously and investigated promptly.
- We are committed to continually reviewing and improving our practices to combat Modern Slavery within our business and supply chain.

Supplier Standards

We ask our suppliers to adhere to the following standards:

- Prohibit any form of Modern Slavery in their operations.
- Ensure that all workers have freely chosen their employment and can leave at any time.
- Provide fair wages and safe working conditions.
- Comply with all applicable labour laws and regulations.

Training and Awareness

We will provide training to employees on identifying and addressing Modern Slavery issues annually. This will include information on:

- Recognising the signs of Modern Slavery.
- Understanding the reporting process.
- Promoting a culture of respect and compliance.

Responsibilities

- **Managing Director:** The Managing Director has ultimate responsibility for ensuring compliance with this policy and for the oversight of our Modern Slavery practices.
- **Management:** Managers are responsible for implementing this policy within their departments and ensuring that their teams are aware of and comply with it.
- **Employees:** All employees are expected to uphold this policy and report any concerns or violations.

Review and Monitoring

This policy will be reviewed annually or as required to ensure its continued relevance and effectiveness. We will take necessary actions to improve our practices and commitments regarding Modern Slavery.

Conclusion

Cavagna Group UK Ltd is committed to being a responsible business and taking a proactive stance against Modern Slavery. Together, we can ensure that our operations and supply chains are free from exploitation.

Approval

This policy has been approved by the Managing Director of Cavagna Group UK Ltd and is effective as of 1st October 2024