



## **Modern Slavery and Human Trafficking Policy & Procedure**

### **1. Introduction**

Castlepoint Markets is committed to upholding the highest standards of ethics, compliance, and integrity in all our business dealings and relationships. Whilst we are currently exempt from the disclosure requirements, we do believe in transparency throughout our operations and aligning our obligations under the UK Modern Slavery Act 2015. We have a zero tolerance for modern slavery and human trafficking in any form and continuously review and enhance the effectiveness of our systems and controls to prevent and detect any form of modern slavery within our operations.

### **2. Scope**

This policy applies to all UK based employees, agency workers, volunteers, business partners, consultants, suppliers, market hall tenants and others associated with our company at any operational site, office location or company-sponsored event.

### **3. What is Modern Slavery and Human Trafficking?**

Modern slavery is a complex issue encompassing various forms of exploitation, including forced labour, debt bondage, forced marriage, and human trafficking. It involves situations where individuals are forced to remain due to threats, violence, coercion, deception, or abuse of power. There are international legal agreements against modern slavery, including the 1926 Slavery Convention, the 1956 Supplementary Convention on Slavery, the 1930 Forced Labour Convention, the 1957 Abolition of Forced Labour Convention and the International Covenant on Civil and Political Rights.

Human trafficking, a component of modern slavery, involves the movement of people into exploitative conditions against their will. It consists of three elements: an action (recruitment, transportation, or harbouring), a means (threat, coercion, or deception), and exploitation (forced labour, sexual exploitation, or organ removal). Victims are often moved to locations where they lack language skills or knowledge to seek help and may be passed or sold to different traffickers.

The International Labour Organisation (ILO) has identified 11 indicators that may signal the presence of forced labour, highlighting the diverse nature of modern slavery and the importance of vigilance in identifying and combating these practices.

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation

- Physical and sexual violence
  - Intimidation and threats
  - Retention of identity documents
  - Withholding of wages
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- Debt bondage
  - Abusive working and living conditions
  - Excessive overtime

Examples of modern slavery and human trafficking in our operating sector could include:

- Unpaid or underpaid labour supplied by a third party e.g. for collection or sorting operations;
- Suppliers of workwear who use exploited labour to produce the clothing;
- A person employed directly at a site who joined under the control of an individual or organised crime group, which retains some or all of the person's wages.

#### **4. Our Commitments**

Our commitment to the UN Sustainable Development Goals translates into our rules of conduct and actions. This involves creating the conditions for the day-to-day ethics that are a primary focus of our governance.

Senior management are responsible for assessing, enhancing, and monitoring steps, by Castlepoint Markets and its suppliers, to meet compliance standards. We manage risk by implementing improvements, monitoring progress and discussing at Management Meetings to ensure compliance and drive specific projects and initiatives.

Management have determined the following key measures:

- Supply chain due diligence through a standardised, risk-based, supplier onboarding and assessment process;
- Market Hall trader onboarding checks including validation of right-to-work documentation, conviction checks and a risk assessment process;
- Robust employee onboarding checks including validation of right-to-work documentation and checks for duplicate bank accounts and addresses;
- Blended learning (e-learning, face-to-face training, operational briefings) to raise awareness of Modern Slavery at all levels of the business;
- Communicated escalation policy with procedural guidelines for when Modern Slavery is identified or suspected within our operations or supply chains.

#### **5. Modern Slavery Escalation Procedure: Reporting Modern Slavery Concerns**

We each have a shared responsibility for ensuring the highest standards of ethical conduct, compliance, and integrity in all our business dealings and relationships. If you have any concerns that slavery or human trafficking may be taking place in any part of our business or supply chain, please report your concerns immediately. We will not tolerate any victimisation of individuals who raise concerns in good faith under this policy.

Modern Slavery awareness and Whistleblowing and reporting policies and procedures are communicated to all employees by email and included as an appendix to their contract of

employment. Further information on whistleblowing is provided in section 5.2. Where a person may be in immediate danger, you should contact the police by dialling 999.

### **5.1 Reporting Modern Slavery Concerns Internally**

Signs of Modern Slavery may include (but are not limited) to the following:

- Someone who always wears the same clothes, often not suitable for their work or the weather;
- Someone unfamiliar with the local area or language;
- Someone who has unexplained or untreated injuries;
- Someone who is always being dropped off at or collected from work (in the same pattern, especially at unusual times, i.e. very early or late at night);
- Someone who avoids conversation or interaction;
- Someone who is reluctant to talk to authority figures; or
- Someone without documentation or money.

If you suspect modern slavery, refrain from confrontation or personal investigation, as this may endanger the victim. Instead, follow the procedure outlined below to ensure a safe and appropriate professional response. Where a person may be in immediate danger, you should contact the police by dialling 999 and inform your manager. If the person is not in immediate danger, inform your manager and follow our Whistleblowing Procedure.

Head of Finance will ensure that any concerns are appropriately investigated, in consultation with other senior management, and Legal Representatives. External parties may be involved in the investigation to offer advice and guidance. If a modern slavery concern is investigated and subsequently proven, a remediation plan shall be implemented.

### **5.2 Whistleblowing Procedure**

We have a confidential Whistleblowing Telephone Line available to all employees and third parties for reporting concerns or suspicions of wrongdoing. Concerns raised under the Whistleblowing Procedure will be passed to the nominated individuals who will safely and carefully assess the situation. Alerts will be recorded by Head of Finance. The Whistleblowing Channels for the UK are as follows:

Report the issue anonymously by calling our UK Whistleblowing Telephone Line. This confidential telephone line is available 24 hours a day, 365 days a year: 01952 265070

For further information please see our Whistleblowing Policy & Procedure which is available to all employees.

### **5.3 Reporting Modern Slavery Concerns Externally (outside of Castlepoint Markets)**

In the UK, if you suspect someone might be a victim of slavery, you have several options:

- Call the police on 101 (or 999 in an emergency)
- Call the Modern Slavery Helpline on 0800 0121 700 or fill out an online form
- Contact the Gangmasters and Labour Abuse Authority (GLAA) to report concerns about the mistreatment of workers at 0800 432 0804, or by emailing [intelligence@gla.gov.uk](mailto:intelligence@gla.gov.uk)

- Contact Crimestoppers on 0800 555 111
- Contact Anti-Slavery International or other specialist anti-slavery organizations

In the Republic of Ireland, if you suspect someone is a victim of human trafficking:

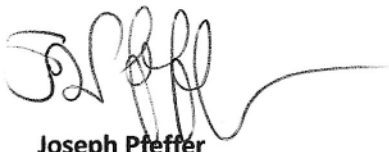
- Call the local Gardaí immediately on 112 or 999 (if in immediate danger).
- Contact Crime-Stopppers on 1800 25 00 25 or email [blueblindfold@garda.ie](mailto:blueblindfold@garda.ie).

#### 6. Responsibility for this Policy

This policy is produced by senior management and has been formally approved by the Director of Castlepoint Markets.

#### Contacts

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| Designated Officer (whistleblowing): | Nigel Bullock<br>Head of Finance<br><a href="mailto:nigel.bullock@castlepointmarketsltd.co.uk">nigel.bullock@castlepointmarketsltd.co.uk</a><br>m. +44(0) 7901 238750                                                                                                                                             |
| Modern Slavery Committee             | Nigel Bullock, Head of Finance<br><a href="mailto:nigel.bullock@castlepointmarketsltd.co.uk">nigel.bullock@castlepointmarketsltd.co.uk</a><br><br>Nisha Devi-Sanghera, Head of Operations & Estates<br><a href="mailto:Nisha.sanghera@castlepointmarketsltd.co.uk">Nisha.sanghera@castlepointmarketsltd.co.uk</a> |
| Confidential Whistleblowing Channels | Report the issue anonymously by calling our UK Whistleblowing Telephone Helpline. This is a confidential helpline available 24 hours a day, 365 days a year: 01952 265070                                                                                                                                         |



Joseph Pfeffer  
Director

22 August 2025