



## 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.

### **Our Policy aims:**

- The company is committed to driving out acts of modern-day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.
- The company's directors have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness.
- Acknowledge responsibility to the Modern Slavery Act 2015 and ensure transparency within the organisation and with suppliers of goods and services to the organisation.
- We will not support or deal with any business knowingly involved in slavery or human trafficking. We will carry out due diligence of potential and existing suppliers and we will take steps where such practices are identified.
- Operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Confidential Reporting (CIRAS). We operate a confidential reporting scheme so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

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.

#### **Training**

We regularly brief all relevant management and staff members, and ensure that our policies reach every employee, in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain.

#### **Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We achieve a level of communication and personal contact with every employee and their understanding of, and compliance with, our expectations regarding modern slavery.

THIS POLICY WILL BE REVIEWD ON AN ANNUAL BASIS

James Amos, Managing director of CA Group  
09th May 2025