

Modern Slavery Policy

This statement constitutes the Carlton Manor statement on slavery and human trafficking under section 54 of the Modern Slavery Act 2015 for the financial year ended 30th June 2023. It sets out the steps that the Carlton Manor has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. Carlton Manor has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place in the business or our supply chain.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. All or some are available upon request.

Our Suppliers

All our business within Carlton Manor operate a supplier policy and maintains a preferred supplier list which have been audited. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery (and on-site audits which include a review of working conditions). Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees are prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We regularly conduct training for our management and staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within 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 of supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

A Shea – Company Secretary