

CHARLES
BENTLEY
EST. 1860

Modern Slavery Policy & Statement

February 2024

Introduction

Charles Bentley & Son Limited ('the Company'), has a zero-tolerance approach to modern slavery and is committed to preventing acts of slavery and human trafficking from occurring within both its business and supply chain, and imposes those high standards on its contractors, suppliers and other business partners.

This policy applies to all individuals working for the Company and at its 3 sites in Loughborough, including anyone providing services to the Company such as consultants, or contractors.

Charles Bentley & Son Limited structure and it's business:

The Company is a British manufacturer of superior brushware, homeware, gardenware, and cleaning products to the general public, wholesalers, public sector establishments and organisations both within and outside the UK.

Principally, The Company's supply chain includes the provision of goods and services such as raw materials, fixtures and fittings, garden and home furniture, cleaning equipment, waste management, DIY, decorating materials and brushware. In the main these are sourced from low-risk countries for the purposes of modern slavery and human trafficking.

Policy Aim

The aim of this policy is to help the Company act in accordance with the Modern Slavery Act 2015, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to slavery.

Our Anti-Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Company has also introduced an Anti-slavery and Human Trafficking clause within its procurement contract to reflect its commitment to acting ethically and with integrity in all its business relationships with suppliers. It has also updated its Whistleblowing Policy to ensure employees are able to raise concerns about malpractice or wrongdoing, in respect of slavery and human trafficking.

We will, as a Company, continue to monitor these and other policies, and will update them as required.

The Law

Modern slavery amounts to a violation of an individual's human rights. Modern slavery encompasses slavery, forced and compulsory labour, and human trafficking whereby

individuals are deprived of their freedom and are exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015 ('the Act'). The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the Company or under its control.

Policy Statement

The Company takes its responsibilities to combat modern slavery seriously as demonstrated by the following measures:

- The prevention, detection, and reporting of modern slavery in any part of its business or supply chains is the responsibility of all those working for the Company or under its control.
- All supply chain lines are continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- A Regular audit and review is conducted of our practices for checking all employees are paid at least the minimum wage and have the right to work.
- The Company encourages anyone to raise any concerns about modern slavery and will support anyone who acts in good faith.
- The Company provides access to remedy and justice for victims of modern slavery, please refer to our various policies.
- The Anti-slavery statement is published on our website.
- The Company will continue to develop its commitment to combat modern slavery and will provide staff training where appropriate.
- This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

What are my Responsibilities in Respect of Modern Slavery?

Everyone who works for us or is under our control is responsible for helping to bring modern slavery to an end. Preventing, detecting and reporting modern slavery in any part of our business or supply chains is everyone's collective responsibility.

However, we don't expect you to become a detective. We believe that by raising awareness of the existence and types of modern slavery and educating you about indicators that may suggest it is taking place will assist us to be more alert to the issue and encourage reporting of suspected incidences of modern slavery.

All recruiting managers must ensure that:

- Recruitment suppliers are only used who agree to abide by the terms of this policy and commit to preventing modern slavery.
- All staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

- All staff are legally able to work in the UK and that any agency has conducted these checks prior to providing candidate details to us or assigning them temporary work at Charles Bentley & Son Ltd.
- Proof of names and residential address are checked during the recruitment and onboarding process. If there appears to be a high number of people residing at the same address this in itself may indicate potential exploitation.
- All workers are aware of their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

All managers should:

- Ask questions about the people in your team - they may tell you something that might indicate that they are in an exploitative situation.
- Follow up anything an individual tells you that raises concern - they may tell you for example that they have to pay for accommodation, food, transport or other services to a third party or agency.

All employees should:

- Remain vigilant and if you suspect that someone is being controlled or forced by someone else to work or provide services, tell your manager or other appropriate person such as a member of the HR Team.
- Report if an unknown person appears to be monitoring the movements of one of our workers or appears to be controlling them in some way which may include the worker being collected and dropped off at work each day.
- Speak to your manager or a member of the HR Team if a colleague tells you something you think might indicate that they are being exploited or ill-treated. Raising your concerns in this way may stop someone else from being exploited or abused.
- Be alert and report any suspicious activity, as people may try to use business premises to traffic people.
- If you think that a situation is not right, ask questions and report any concerns or suspicions you have to your manager or a member of the HR Team.

Reporting Suspected Modern Slavery

If you think that you may have come across an instance of modern slavery you should always report it to your manager, supervisor or the HR department. In addition, you can also report suspected instances of modern slavery to the police by calling 101.

If you believe potential victims are in immediate danger, then you should call 999. Please also ensure that you inform your manager if you report suspected cases to the Police as soon as reasonably possible after you have made the call.

The Government's 24-hour Modern Day Slavery Foundation Helpline may be reached by calling 0800 0121 700. This helpline is available for victims, employers, employees and members of the public to call for expert support and advice. You will be provided with information and guidance on what to do next.



Protection and Support for Employees

We understand you may be worried about possible repercussions if you report any suspicions about modern slavery. We encourage all employees to be open and will support anyone who raises genuine concerns about modern slavery even if they subsequently prove to be unfounded.

Please remember however that making malicious or intentionally false allegations is a serious disciplinary offence which may result in you being subjected to disciplinary action up to and including dismissal for gross misconduct in accordance with the Company's Disciplinary Policy and Procedure. This may also be the case if you fail to observe Company Policy in this matter.

Monitoring & Reviewing Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

The policy will be regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

The Company will ensure that all individuals working for the Company are advised of the policy.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Directors to see that all relevant employees receive notice. Written notice and/or training should be considered.

This statement has been approved by Charles Bentley, Managing Director, for the financial year ending 31st March 2024.

This statement will be reviewed and updated every year.

Signed _____ Charles Bentley, Managing Director _____

Dated _____ 1st February 2024 _____

Charles Bentley & Sons Ltd Anti-Slavery Statement

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

Charles Bentley & Sons Ltd are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. In addition, our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Here are the steps Charles Bentley & Sons Ltd has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

Supply Chains:

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers.

Policies and Principles:

The following policies and statement is available to all staff from the main office:

- Equality & Equal Opportunity policy (to include bullying & harassment, discrimination, victimisation and equality)
- Recruitment, Employment and Promotion Policy

We will continue to embed the principles through:

- providing awareness training (as part of our induction and refresher) to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- making sure Charles Bentley & Son Ltd strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero tolerance policy towards modern slavery
- ensuring that all staff receive training on modern slavery and ethical employment practices

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