

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

As an international organisation, we are committed to creating a leading great and safe place to work which includes improving our practices to combat slavery and human trafficking. Together, our purpose is to accelerate society's progress towards a fair and inclusive future for all.

## Our business

We have a zero-tolerance approach to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all our business dealings and relationships.

We are committed to ensuring that modern slavery or human trafficking does not exist within our supply chains or in any part of our business activities. Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our employment and 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.

CAF services are provided directly by CAF and through a group of wholly owned or controlled subsidiaries. These are principally involved in three areas:

- Financial services for charities
- Investment management
- Charitable donations within and outside the United Kingdom

The CAF group includes:

- CAF Bank Ltd
- CAF Financial Solutions Ltd
- CAF Investments Ltd
- CAF Venturesome
- CAF Global Alliance covering US, Canada, Brazil, Russia, India, South Africa

## Our policies on slavery and human trafficking

Modern slavery and human trafficking are a crime and a 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.

Our supply chains are consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We procure a wide variety of goods and services, from networks and IT services to stationery and consultancy. Some of these products and services we use in our own business (eg waste disposal services and stationery) and some we use as part of what we use to sell to our customers (eg bespoke IT software platforms). Around 600 suppliers sell to us.

On top of this, many of our suppliers have their own suppliers. Therefore, our supply chain is large and complex. We prioritise attention on companies that supply high value products or services, which without, our business couldn't run.

### **Due diligence processes for slavery and human trafficking**

To ensure all those in our supply chain and contractors comply with our practices, we have in place for new contracts a statement that clearly sets out a requirement that suppliers and their sub-contractors must adhere to the Modern Slavery Act 2015 and that the contract may be terminated if there is a breach of this requirement.

When we on-board new suppliers, we have a rigorous due diligence process that includes:

- Undertaking references from a supplier's current customers
- Undertaking site visits, where this is possible
- Requiring confirmation that suppliers adhere to all appropriate legislation, including but not limited to the Modern Slavery Act 2015, and
- Confirmation that all suppliers and sub-contractor's employees and workers are paid at least the UK Living Wage.

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our primary supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains as a result of our due diligence
- Monitor potential risk areas in our supply chains. This is achieved through the service reviews, site visits we conduct and questionnaires
- Encourage reporting of any concerns relating to slavery and human trafficking through our confidential and anonymous whistleblowing reporting system
- Enable any employee to raise a grievance if they have concerns about their employment status, remuneration and/or treatment.

Additionally, we have:

- Implemented a policy to ensure our staff are vigilant to the potential threat of slavery and human trafficking
- Communicated our policy to our employees
- A recruitment policy and associated employment checks policy to prevent the engagement of forced labour
- A confidential and anonymous (if requested) whistleblowing service for our employees to use if they suspect slavery or human trafficking is taking place in our supply chains. We monitor all whistleblowing reports. In the last year, we have received no whistleblowing cases relating to modern slavery or human trafficking.

### **Risk assessment and management**

If, as a result of the due diligence procedures and processes that we have introduced, any supplier is deemed to be high risk in terms of modern slavery and human trafficking, they would be placed on a register held by our compliance function. Further due diligence would be undertaken to either satisfy ourselves that they can be removed from the register, or if following further investigations, a serious suspicion that they had or were likely to breach the Modern Slavery Act 2015, this would be immediately reported to the appropriate authorities and would give rise to a suspension of our commercial relationship with them.

### **Key performance indicators and reporting**

We are developing key performance indicators to ensure we measure the effectiveness of the steps being taken to eliminate modern slavery and human trafficking in our supply chains. We are taking a risk-based approach to this and they will be in place by 30 June 2022.

We will report on an annual basis our performance relating to the effective elimination of modern slavery and human trafficking in our supply chains to the Executive Committee and the Trustees of CAF. This will include performance against our key performance indicators in the previous year.

### **Training**

We require all employees at CAF who have a direct responsibility for facilities, legal, procurement and recruitment to undertake specific training on an annual basis. This includes employees in our Procurement Team, Legal and People teams.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we require our staff to be familiar with our Anti-slavery and Human Trafficking Policy and we provide periodic reminders to our staff as well as the opportunity to undertake annual e-learning on the subject.

## **Further steps**

Following a review of the effectiveness of our plans, we have taken the following steps to combat slavery and human trafficking:

- On a risk basis, we have written to our key suppliers requesting that they confirm that they agree to be bound by the Modern Slavery Act 2015 and that they have appropriate modern slavery policies in place within their organisation to ensure that they do so
- Established a full directory of all our suppliers to enable timely communication and effective monitoring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CAF's Modern Slavery Statement for the financial year ending 30 April 2021 and covers all UK entities that are part of the CAF Group including:

- CAF
- CAF Bank Ltd
- CAF Financial Solutions Ltd
- CAF Investment Ltd
- Southampton Row Trust Ltd.