

# MODERN SLAVERY and HUMAN TRAFFICKING STATEMENT

## Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that PFD (Carlisle) Ltd has taken to ensure there is no slavery or human trafficking in its own business and supply chains. This statement relates to actions and activities during the financial year 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of PFD (Carlisle) Ltd:

- Retail
- Wholesale
- Catering

## Our Suppliers

PFD (Carlisle) Ltd operates a supplier policy and maintains a preferred supplier list. 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 the particular organisation has never been convicted of offences relating to modern slavery. 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. They pay their employees at least the minimum wage.
4. We may terminate the contract at any time should any instance of modern slavery come to light.

We require our suppliers to comply with the Modern Slavery Act 2015 and to commit to enforcing and maintaining anti-slavery and human trafficking policies.

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Modern Slavery Policy.** The Company makes this policy available to all employees and to staff when they join the Company.
- **Recruitment Policy.** We operate a robust recruitment policy, including eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Employee code of conduct.** The Company's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

- **Whistleblowing policy.** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's Whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Code of Business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. Suppliers are required to ensure that its suppliers demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Social responsibility policy.** Wherever we do business it will always be in full compliance with the laws of the country concerned and with sensitivity to local customers and culture. However, where local law or customs permit business practice which falls below our standard, employees throughout the world will still be expected to adhere to the company's guiding principles. We support ethical trading initiatives to protect the vulnerable from exploitation.

**Our Performance Indicators**

We will know the effectiveness of the steps 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.

**Further Steps**

We intend to work further with our supply chain to highlight any areas of risk and to reinforce policies and procedures within the business.

**Approval**

This Modern Slavery and Human Trafficking statement was approved by the Board of Directors of PFD (Carlisle) Ltd on ..... **31st March 2021** .....



Signed: .....

Graham Jenkins – Managing Director