

## About the Modern Slavery and Human Trafficking Policy

### Policy Purpose

The overarching purpose of this document is to outline the Modern Slavery and Human Trafficking policy of Cast Group Services Ltd, which also applies to Cast Fit Out Ltd., Cast Furniture Ltd., Cast Living Ltd. and Cast Contracts Ltd.

This policy is pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Cast Group Services Ltd annual modern slavery and human trafficking statement.

### Policy Remit

The following business functions are covered by this Policy:

- All business functions

The following sites are covered by this Policy:

- All sites

### Policy Owner

**Nick Moss (Operations Director)** is the Policy Owner and responsible for ensuring that it is maintained, exercised and updated in accordance with internal requirements for compliance.

### Policy Distribution

This policy is distributed as follows:

Name	Role
All staff of Cast Group Services Ltd	N/A
All staff of Cast Fit Out Ltd	N/A
All staff of Cast Furniture Ltd	N/A
All staff of Cast Living Ltd	N/A
All staff of Cast Contracts Limited	N/A
All suppliers and sub-contractors	N/A
All clients	N/A

### Policy Storage

This policy is stored electronically on the Cast Sharepoint site in the 'Admin / Policies' folder.

## Policy Issue and Review Date

This policy was issued March 2023 and is due for formal review April 2024.

## Policy Links

This Modern Slavery and Human Trafficking Policy should be considered in addition to the other related Cast documentation listed below:

- Cast Data Protection Policy
- Cast Staff Handbook

## Our operations and supply chains

The Cast group of companies specialise in commercial office design and fit out, and ancillary services including furniture supply within both the commercial and build-to-rent (BTR) sectors.

Cast have grown to over 50 direct employees operating across the UK. Cast aim to centralise our principles across our group of businesses to ensure our same exacting standards apply to all companies and this is true for managing the risk of modern slavery and human trafficking in any part of our supply chain.

Cast employ many subcontractors as we primarily operate as a main contractor in the commercial office fit out market and we have numerous suppliers, which has increased since inception of the Cast Furniture dealership business and the Cast Living BTR furniture supply business.

## Our Modern Slavery and Human Trafficking Policy

Cast Group Services Ltd. are committed to ensuring that there is no modern slavery, human trafficking or coercion of persons in our Company, in associated companies, subcontractors or labour only service providers.

This policy reflects our group of companies' commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our, or any related Company.

## Due Diligence - Potential areas of risk

### Directly employed persons

Cast have a very small base of directly employed persons, and we never source our personnel from a labour agency, instead operating a direct interview process resulting in direct contracts. This negates any possibility that a person would not receive full remuneration for their work.

We never seek to employ persons directly outside of the UK for our UK operations and require appropriate passports, permits to work and leave to stay in the UK prior to a person commencing work, thus negating any possible trafficking issues. All of our employees are paid directly into their own bank accounts by bank transfer, we do not allow for payment to third parties. Details of

payments are shared digitally via a payslip detailing hours worked and any deductions for tax and social security.

Additionally, all employees are vetted for the right to work in the UK.

## **Labour only contractors**

Cast rarely employ labour only subcontractors to provide operatives and machine operatives on our sites.

To mitigate the opportunity of trafficking, slavery or coercion we require confirmation that a subcontractor employs their own policy such as this prior to their employment by any Cast, which is reviewed and approved by means of an extensive subcontractor pre-qualification questionnaire process.

## **Bona Fide contractors**

Cast extensively employ bona fide contractors to provide specific and professional trades on our sites. To mitigate the opportunity of trafficking, slavery or coercion we require confirmation that a contractor employs their own policy such as this prior to their employment by any of the Cast businesses, which is achieved by means of an extensive subcontractor pre-qualification questionnaire process.

## **Suppliers**

Cast utilise many suppliers in the delivery of our projects and are unable to monitor the policies of all of them. We do however favour uk-based suppliers who are also pre qualified and uphold our values as a business with regards to transparency and openness. We hold all suppliers to their legal requirements under the law and will report any circumstances we believe to be improper.

## **Adherence to this policy**

If it is found that any person, company or agency associated with the Company is not abiding by the Slavery and Human Trafficking law then this will be reported to the appropriate authorities, and such person, company or agency will be suspended from use by the Company. In the case of an employee, disciplinary proceedings may result in Gross Negligence charges being brought, which would result in dismissal with prejudice.

## **Training**

Relevant employees within the Cast group are required to undertake an e-learning module to ensure they understand what Modern Slavery and Human Trafficking is, the laws around it, how to spot it in its different forms, how to raise concerns links to further reading.

The Company commits to providing training to all operative personnel within our remit by way of continuous professional development training regarding modern slavery and human trafficking.

## Policy approval and review

This Modern Slavery and Human Trafficking policy has been approved by Zoe Moss, Managing Director.

A handwritten signature in black ink, appearing to be the name "Zoe Moss".