

## MODERN SLAVERY POLICY STATEMENT

In the conduct of our business at every level, whether internally or externally working with our colleagues, Customers or suppliers, we have defined a set of values including that of modern slavery as defined in the Modern Slavery Act 2015 that are applicable to all Cuffe Plc operations.

### Integrity

- We are committed to comply with the requirements of the Modern Slavery Act 2015;
- We are committed to ensure that there is no slavery or human trafficking occurring within the organisation or its supply chains;
- We are committed to ensuring that Risk Assessments are carried out to determine any risks to the Company and to identify any external risks from our suppliers or Clients.

### Supply Chain

- We will work with our suppliers and Clients to ensure that we all ensure that the requirements of the Act are complied with;
- We will ensure that our supply chain is transparent in their obligations to the Modern Slavery Act and that we have confidence in those goods and services being provided by workers who do so at their own free will.

### Responsibilities

- It is the responsibility of the Personnel Manager to ensure that all Foreign Nationals that are engaged by the Company are within the UK legally and they have a legal right to work;
- It is the responsibility of Contract Managers that the supply chain complying with the requirements of Modern Slavery Act 2015 in all manners;
- It is the requirement of all Responsible Managers that any non-compliance with the Modern Slavery Act 2015 report this to their Immediate Responsible Manager/Director.

### Reporting of Incidents

- It is the requirement of all Responsible Managers that any non-compliance with the Modern Slavery Act 2015 report this to their Immediate Responsible Manager/Director;
- It is also the requirement of all Responsible Managers/Directors to report to inform to the Police if they believe that a crime has been committed in relation to the Modern Slavery Act 2015.

### Training

- The Company will ensure that suitable and sufficient training about slavery and human trafficking is given to the Responsible Managers/Directors and that refresher training is given each 12 months;
- The Company will ensure that all Supervisors and Operatives are given an overview of the Modern Slavery Act and issued with a copy of this Statement of Intent;
- The Company will ensure that if requested, in writing, that a copy of the company's Modern Slavery Act Statement of Intent is issued to them within 30 days of the request.

The Company recognises the important role it must play for the achievement of a more sustainable future, and will implement this Modern Slavery Act Statement of Intent, as an element within our overall sustainability strategy.

The Board of Cuffe Plc is fully committed to ensuring that Cuffe Plc complies both with the letter and spirit of the principles in the Modern Slavery Policy. For that reason, Mr Simon Cook has been appointed by Cuffe Plc with the responsibility and authority to oversee and drive our Modern Slavery Policy.

For and on behalf of Cuffe Plc,



Simon Cook  
Director

Dated: 1<sup>st</sup> August 2023  
Expiry 31 July 2024