

Modern Slavery Act Policy Statement



Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically, with integrity and transparency in all our business dealings and relationships and likewise expects our people and suppliers to adopt the same approach.

Policy Statement

Our Modern Slavery Policy sets out our position of zero tolerance of modern slavery and human trafficking in any form in our business and partners. We are committed to acting ethically and with integrity in our business dealings and relationships, and to creating systems and controls designed to ensure modern slavery and human trafficking are not taking place in our business or suppliers.

Our Processes of Managing Risk

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy. We strongly encourage anyone who has any concerns to report it to their line manager, who is required to act and ensure that no one suffers detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

In order to assess the risk of modern slavery, we use the following processes:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains
- Review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks
- Protect whistleblowers

Training and Communication for Staff

To ensure full understanding, Carbon Visibility will provide regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains. This is so employees know how to identify modern slavery and how to report it.

In addition we ensure:

- Visibility of the Policy accessed via our Intranet
- Communicate to staff to read the Statement and Policy and confirm understanding
- All new employees undertake a thorough induction process to learn about Company Policies and to become familiarised with the Modern Slavery Act, and expected standards of behaviour

Responsibility for the Policy

It is the responsibility of ALL Carbon Visibility personnel to maintain Carbon Visibility's duties in respect of the Modern Slavery Act 2015. Directors and Senior Managers hold special responsibilities to hear, support and investigate allegations by those raising concerns in compliance with the Act and our related Whistleblowing Policy.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. The Company may terminate without financial penalty its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Approved

A blue ink signature of Neil Armstrong, written over a horizontal line.

Neil Armstrong [Founder & CEO]

Date

01/08/2020