



MODERN SLAVERY ACT 2015 POLICY STATEMENT

Introduction

Capital Reinforcing was established in 2002 and in that time has developed from one small regional reinforcing bar supplier to a comprehensive national supplier of steel reinforcement and associated products for use in the construction industry.

Capital Reinforcing are fully aware that Slavery and Human Trafficking remains as a hidden blight on our global society and that in our supply chain and operations we have to be alert to risks, however small, and act accordingly to any findings that are reported or discovered.

Capital Reinforcing is committed to ensuring, so far as is reasonably practicable, that there is no modern slavery or human trafficking in any part of the supply chain or operations. This Modern Slavery Policy reflects our commitment to act ethically and with transparency and integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking part in any of our supply chains

Capital Reinforcing policies and procedures

We operate a number of policies and procedures which reflect our commitment to acting properly in all of our business relationships and to implementing and enforcing effective systems and controls. They apply to all our employees and to anyone engaged on a temporary basis.

Our key policies and procedures which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chains include our:

- Dignity at Work Policy – which is designed to help ensure that all of our staff and anyone that works for us on a temporary basis is treated with both dignity and respect.
- Risk management policy – which is designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).
- Health, safety and environment policy – a key aim of which is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.
- HR procedures – we check that all our staff have appropriate right to work documents and ensure that they are paid fairly and enjoy a competitive remuneration package. We have procedures in place to safeguard the interests of young people and any unpaid work experience volunteers working at Capital Reinforcing.
- Procurement procedures – which sets out a number of factors to be considered when selecting our suppliers, including whether the supplier will be a good business partner

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for Capital Reinforcing. This in turn involves considerations of supplier reputation and compliance with laws and ethical procedures.

- Agreements policy – our template agreements and standard terms and conditions require suppliers to comply with the law and include specific provisions in relation to modern slavery and human trafficking.
- Anti-bribery policy – which reminds our people to take account of any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption.
- Public interest disclosure policy – which provides guidance on how to report suspected dangers or wrongdoing in the workplace

Our policies and procedures are monitored by a relevant policy owner within our organisation and reviewed at least annually. We will continue to review our policies to ensure that they are effective and appropriate.

In particular, our procurement team continues to review and strengthen our centralised procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.

Capital Reinforcing due diligence for slavery and human trafficking

We have looked at all our suppliers and assessed the key ones in more detail to ensure that they have appropriate policies in place to minimise the risk of slavery and human trafficking in their business.

Based on our review, we are satisfied that our key suppliers have appropriate policies in place. We also carry out due diligence checks on material suppliers and routinely monitor their compliance with applicable law (including in relation to slavery and human trafficking) as well as certain 'key performance indicators' such as training and paying the London Living Wage or the National Living Wage. Due diligence and monitoring is ongoing and under review to improve supplier vetting and to minimise further a range of risks, including slavery and human trafficking.

Training

We try to ensure that adequate information and training is provided to all our employees, contractors or visitors on all relevant matters. Here are some examples of the information and training we provide:

- all new starters attend an induction session which includes information and training on our policies
- managers are provided with a range of leadership training and are assisted by our HR team in HR-related matters including recruitment, remuneration and employee wellbeing

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- our procurement team, assisted by our legal team, routinely seek out information and training to help identify and address risks in both our organisation and supply chain (including in relation to slavery and human trafficking) and will continue to do so.

Signed:



Dermot Owens
January 2020
Managing Director