

Modern Slavery and Human Trafficking Policy

Charles Twite & Co Ltd

Policy Statement

Charles Twite & Co Ltd is committed to preventing modern slavery and human trafficking in all aspects of our business operations. We recognize our responsibility to be aware of the risks, however small, and to prevent any form of modern slavery or human trafficking within our supply chains or any part of our business. We uphold the highest standards of ethical behaviour and require the same from our suppliers and partners.

Scope

This policy applies to all employees, suppliers, contractors, and business partners working with Charles Twite & Co Ltd. We expect our suppliers to share our commitment to these values and to operate in full compliance with the Modern Slavery Act 2015.

Commitments

1. Awareness and Training

- We will provide appropriate training to our employees to help them identify the risks of modern slavery and human trafficking within our operations and supply chains.
- All staff members are encouraged to report any concerns related to modern slavery and human trafficking. This includes any suspected misconduct by suppliers or third parties.

2. Risk Assessment

- We will conduct regular risk assessments of our supply chains to identify potential risks of modern slavery and human trafficking.
- High-risk suppliers and regions will be closely monitored and subjected to enhanced due diligence processes.

3. Supplier Engagement

- All suppliers must agree to comply with our modern slavery policy as part of our supplier code of conduct.
- We reserve the right to terminate relationships with suppliers who fail to comply with our policy or who are found to be involved in modern slavery or human trafficking.

4. Reporting and Accountability

- We have established clear procedures for reporting any concerns related to modern slavery or human trafficking. Employees can report issues confidentially, and without fear of retaliation.
- All reports will be thoroughly investigated, and appropriate actions will be taken.

5. Continuous Improvement

- We are committed to continuous improvement in our approach to combating modern slavery and human trafficking. We will regularly review and update this policy as necessary to ensure its effectiveness.

Approval and Review

This policy is reviewed annually and approved by the Director of Charles Twite & Co Ltd.

Signed, *RL smith*

Rachel Smith
Director
Charles Twite & Co Ltd
Date: 26.09.2025