

	Annex N Human Rights, Modern Slavery & Human Trafficking Policy Statement	Doc. No.	IMS-02-P016
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1. Human Rights

Correll Group understand that human rights due diligence is an ongoing process that requires particular attention at certain stages in our business activities, such as when we form new partnerships or our operating conditions change, as these changes may create new potential or actual impacts on human rights.

In certain countries where we operate, there are particularly high, systemic risks of human rights abuses. Correll Group understand that this means that we must put in place additional due diligence to assess these risks and address them effectively, where appropriate, using our leverage to work either in one-to-one relationships or in broad-based partnerships.

Correll Group recognise the importance of dialogue with our employees, workers and external stakeholders who are or could potentially be affected by our actions. Correll Group pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation and recognise that women and men may face different risks.

Remedy

Correll Group place importance on the provision of effective remedy wherever human rights impacts occur through company-based grievance mechanisms. Correll Group continue to build the awareness and knowledge of our employees and workers on human rights, including labour rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our grievance channels. Correll Group are committed to continue increasing the capacity of our management to effectively identify and respond to concerns. Correll Group also promote the provision of effective grievance mechanisms by our suppliers.

Empowering Women through Rights, Skills and Opportunities

Around the world many women face discrimination and disadvantage, lack access to skills and training, and face roadblocks to their active participation in the economy. They often lack the protection of basic rights and laws. Poverty, discrimination and violence against women are major barriers to opportunity. Women are integral to our business model and growth ambitions. Correll Group seek to manage and grow socially responsible businesses where women participate on an equal basis. We believe that women's rights and economic inclusion are priorities to win long-term.

Our approach starts with the respect of the rights of women and extends to their promotion as well as helping to develop skills and open up opportunities, both in our own operations and our value chain.

2. Modern Slavery and Human Trafficking

Correll Group is committed to ensuring any acts of modern-day slavery and human trafficking are avoided within its business and within its supply chains including sub-contractors and other interested parties.

The company acknowledges responsibilities under the Modern Slavery Act 2015 and will ensure awareness within the organisation and with suppliers of goods and services to the organisation.

As part of our approved management systems, our recruitment and supplier approval processes incorporate controls undertaken to mitigate the risk of any involvement in or dealing with any organisation knowingly involved in slavery or human trafficking. Such controls are monitored for continued effectiveness as part of our Management System Review process.

The company Directors and senior management are responsible for the implementation and communication of this policy within the organisation and for ensuring sufficient trained resources are in place to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

All employees shall be familiarised with this policy as part of the company induction process.

This policy will be reviewed annually by the directors for continued suitability and be accessible to all employees and other interested parties, either electronically or by publication on the company server.

Any employees who are found to be, or suspected of, breaching this policy and the requirements of the Modern Slavery Act 2015 shall be subject to the company disciplinary process which may result in dismissal and/or referring to the relevant authorities.

Sam Dowey
Managing Director