



# Modern Slavery and Human Trafficking Statement

As an international organisation, we are committed to creating a leading great and safe place to work which includes improving our practices to combat modern slavery and human trafficking. Together, our purpose is to accelerate progress in society towards a fair and sustainable future for all.

## OUR BUSINESS

We have a zero-tolerance approach to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all our business dealings, transactions and relationships.

Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our employment and business activities, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking does not taking place anywhere in our supply chains.

CAF services are provided directly by CAF and through a group of wholly owned or controlled subsidiaries. These are principally involved in three areas:

- Financial services for charities
- Investment management
- Charitable donations within and outside the United Kingdom

The CAF group includes:

- CAF Bank Ltd
- CAF Financial Solutions Ltd
- CAF Investments Ltd
- Southampton Row Trust Limited
- CAF America
- CAF Canada

## OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

Modern slavery and human trafficking are a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continually review and update all our policies. We expect the same high standards from all our contractors, suppliers and others we work with. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

We procure a wide variety of goods and services, from networks and IT services to stationery and consultancy. Some of these products and services we use in our own business (eg waste disposal services and stationery) and some we use as part of what we use to support our customers (eg bespoke IT software platforms). Around 400 suppliers sell to us.

In addition, many of our suppliers have their own suppliers. Therefore, our supply chain is large and complex. We prioritise attention on companies that supply high value products or services, without which our business couldn't operate.

## **DUE DILIGENCE AND PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

To ensure all those in our supply chain and contractors comply with our practices, we have in place for new contracts a statement that clearly set s out a requirement that suppliers and their sub-contractors must adhere to the Modern Slavery Act 2015 and that the contract may be terminated if there is a breach of this requirement.

When we on-board new suppliers, we have a rigorous due diligence process that includes:

- Undertaking references from a supplier's current customers
- Undertaking site visits, where this is possible
- Requiring confirmation that suppliers adhere to all appropriate legislation, including but not limited to, the Modern Slavery Act 2015, and
- Confirmation that all suppliers and sub-contractor's employees and workers are paid at least the UK Living Wage.

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our primary supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains as a result of our due diligence
- Monitor potential risk areas in our supply chains. This is achieved through the service reviews and site visits we conduct, and questionnaires
- To report confidentially and anonymously (if requested) whistleblowing concerns to an independent Whistleblowing service for our employees to use if they suspect slavery or human trafficking is taking place in our supply chains. We monitor all whistleblowing reports. In the last year, we have received no whistleblowing cases relating to modern slavery or human trafficking.
- Enable any employee to raise a grievance if they have concerns about their employment status, remuneration and/or treatment.

Additionally, we have:

- Implemented a policy to ensure our staff are vigilant to the potential threat of slavery and human trafficking
- Communicated our policy to our employees
- A Recruitment Policy and Procedure and associated employment checks policy to prevent the engagement of forced labour.

## **RISK ASSESSMENT AND MANAGEMENT**

If, as a result of the due diligence procedures and processes that we have introduced, any supplier is deemed to be high risk in terms of modern slavery and human trafficking, they would be placed on a register. Further due diligence would be undertaken to either satisfy ourselves that they can be removed from the register, or if following further investigations, a serious suspicion that they had or were likely to breach the Modern Slavery Act 2015, this would be immediately reported to the appropriate authorities and would give rise to a suspension of our commercial relationship with them.

## **KEY PERFORMANCE INDICATORS AND MANAGEMENT**

We measure the effectiveness of the steps being taken to eliminate modern slavery and human trafficking in our supply chains. We are taking a risk-based approach to this

We will report on an annual basis our performance relating to the effective elimination of modern slavery and human trafficking in our supply chains to the Executive Committee and the Trustees of CAF.

## **TRAINING**

We require all employees at CAF who have a direct responsibility for facilities, legal, procurement and recruitment to undertake specific e-learning training on an annual basis. This includes employees in our Procurement Team, Legal and People teams.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we require our employees to be familiar with our Anti-slavery and Human Trafficking Policy and we also provide periodic reminders and provide the opportunity for them to undertake annual e-learning on the subject.



## FURTHER STEPS

Following a review of the effectiveness of our plans, we have taken the following steps to combat slavery and human trafficking:

- On a risk basis, we have written to our key suppliers requesting that they confirm that they agree to be bound by the Modern Slavery Act 2015 and that they have appropriate modern slavery policies in place within their organisation to ensure that they do so
- Established a full directory of all our suppliers to enable timely communication and effective monitoring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CAF's Modern Slavery Statement for the financial year ending 30 April 2022 and covers all entities that are part of the CAF Group including:

- CAF Bank Ltd
- CAF Financial Solutions Ltd
- CAF Investment Ltd
- Southampton Row Trust Ltd
- CAF America
- CAF Canada