

ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights and it is a criminal offence under the Modern Slavery Act 2015. 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 a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and 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, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applied to all businesses within the Celtic Contractors to subcontractors undertaking business on behalf of the Celtic Contractors and to all directors, colleagues and representatives to any of the above entities, whether permanent, temporary or contract (Celtic Contractors Personnel), within all areas and functions.

Celtic contractors Ltd also expect its business partners, suppliers and contractors to abide by the terms of this policy.

RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The integrate management system manager, Florin Constantin Cristat has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Celtic integrate management system manager.

COMPLIANCE WITH THE POLICY

- ✓ You must ensure that you read, understand and comply with this policy.
- ✓ The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- ✓ You must notify your manager or the compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- ✓ You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- ✓ If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- ✓ If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Celtic integrate management system manger.
- ✓ We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery must be communicated to all employees, suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

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NON-COMPLIANCE / BREACHES OF THIS POLICY

Celtic Contractors Ltd will take firm disciplinary action in cases of modern slavery practices. These will very likely lead to dismissal or the termination of contract of involved parties. Furthermore, cases of such practices may be reported to the relevant public authorities, which may result in criminal prosecution

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

REVIEW

The Anti-Slavery and Human Trafficking Policy will be reviewed at least annually as per Celtic Integrate Management System and approved by the Company's Board of Directors. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published yearly.



Jon Whyte

Managing Director

Celtic Contractors Ltd

Date: 01.09.2021