Modern Slavery and Human Trafficking Policy

Crown Integrated Services | October 2026

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Voluntary Commitment: Crown Integrated Services has an annual turnover below the £36 million threshold at which the Modern Slavery Act 2015 mandates publication of a transparency statement. Notwithstanding this, the company voluntarily adopts this Policy as an expression of its commitment to ethical business conduct, human rights, and responsible supply chain management.

1. Purpose

This Policy sets out Crown Integrated Services' ("the Company", "CIS", "we", "our") commitment to preventing modern slavery and human trafficking in its business operations and supply chains. It applies across all activities, relationships, and geographies in which the Company operates.

Although CIS does not meet the statutory turnover threshold under Section 54 of the Modern Slavery Act 2015 (the "Act"), we recognise that modern slavery is a serious global crime and a gross violation of fundamental human rights. We are committed to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our own business or supply chains.

2. Scope

This Policy applies to:

- All employees, workers, and contractors engaged by CIS regardless of seniority or contractual status;
- All directors, officers, and partners of the Company;
- All agents, consultants, and third-party representatives acting on behalf of CIS;

- All businesses and individuals within the Company's supply chain.

Compliance with this Policy is mandatory for all in-scope persons and forms part of the standards expected under CIS's Code of Conduct.

3. Understanding Modern Slavery

Modern slavery is an umbrella term that encompasses several serious criminal offences as defined by the Modern Slavery Act 2015. It includes:

3.1 Slavery

The exercise of powers of ownership over a person, treating them as property and denying their freedom.

3.2 Servitude

A situation in which a person is coerced to provide services by the use of threats or force and believes themselves unable to leave.

3.3 Forced or Compulsory Labour

Work or service exacted from a person under threat of punishment, where the person has not offered themselves voluntarily and cannot freely leave.

3.4 Human Trafficking

The recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, deception, or abuse of power for the purpose of exploitation.

These practices may be hidden and occur across many sectors. CIS is committed to identifying, preventing, and reporting any such activity that comes to its attention.

4. Our Commitment

Crown Integrated Services is committed to:

- Conducting its business in a manner that respects and upholds human rights, consistent with the UN Guiding Principles on Business and Human Rights;
- Ensuring that modern slavery and human trafficking do not occur within any part of the Company's activities or supply chains;
- Taking a risk-based approach to identifying and addressing modern slavery risks;
- Engaging with suppliers, contractors, and partners to promote responsible labour practices throughout our supply chains;
- Providing appropriate training and awareness to all relevant staff;
- Maintaining an accessible and confidential mechanism for reporting concerns;
- Continuously reviewing and improving our approach as our business evolves.

5. Risk Assessment and Due Diligence

5.1 Identifying Risk

The risk of modern slavery can arise at any point in the supply chain or in employment practices. CIS will assess risk by considering:

- The nature of the industry, sector, and activities in which we and our suppliers operate;
- The geographic locations of operations and procurement, giving particular attention to higher-risk jurisdictions;
- The vulnerability of workers, including migrant workers, agency workers, and those in low-skilled or low-paid roles;
- The complexity and transparency of our supply chains.

5.2 Supplier Due Diligence

When selecting and managing suppliers, the Company will:

- Include appropriate modern slavery and labour rights obligations within supplier contracts and terms of business;
- Request self-assessment questionnaires or equivalent declarations from key suppliers regarding their labour practices;
- Conduct enhanced due diligence for suppliers operating in higher-risk sectors or geographies;
- Reserve the right to audit supplier premises, operations, or records where concerns arise;
- Terminate relationships with suppliers who fail to meet our minimum standards and do not take corrective action within a reasonable timeframe.

6. Responsible Employment Practices

CIS is committed to ensuring that all individuals engaged by or on behalf of the Company are employed lawfully and treated fairly. In particular, the Company will:

- Verify the right to work of all employees and workers in accordance with applicable UK law;
- Pay at least the National Living Wage or National Minimum Wage as applicable and ensure wages are paid directly to workers, without unlawful deductions;
- Ensure that no worker is required to pay recruitment fees or deposits as a condition of employment;
- Not withhold identity documents, passports, or other personal property belonging to any worker;
- Provide clear, written employment contracts in a language workers understand;
- Ensure workers are free to leave their employment or engagement at any time, subject to reasonable notice;
- Monitor agency and third-party labour providers to ensure they comply with equivalent standards.

7. Training and Awareness

CIS recognises that training is essential to ensuring this Policy is effective. The Company will:

- Provide awareness training on modern slavery to all employees, with enhanced training for those in procurement, HR, and management roles;
- Ensure that all new starters receive information on this Policy as part of their induction;
- Refresh training at least annually, or when material changes occur to the risk environment or regulatory landscape;
- Make this Policy available to all employees, workers, and relevant third parties via the Company's intranet or equivalent communication channels.

8. Reporting Concerns

CIS expects all employees, workers, and third parties to report any concerns relating to modern slavery or human trafficking promptly. We are committed to ensuring that all concerns are investigated appropriately and without retaliation.

Concerns may be raised by:

- Speaking directly to your line manager or any member of the senior leadership team;
- Contacting the designated Policy Owner (see Section 10);
- Using the Company's whistleblowing channel, which can be accessed confidentially and anonymously if preferred.

No person who raises a concern in good faith will suffer any detriment, victimisation, or disadvantage as a result of doing so. This protection applies whether or not the concern is ultimately substantiated.

Where there are reasonable grounds to believe that a criminal offence has occurred, CIS will make a report to the relevant authorities, including the National Crime Agency (NCA) via its Modern Slavery Helpline (0800 0121 700) or by contacting the police.

9. Roles and Responsibilities

Responsibility for this Policy is allocated as follows:

Role / Function	Responsibilities
Board of Directors	Overall accountability for the Policy; setting the tone from the top; ensuring adequate resources and oversight.
Designated Policy Owner	Day-to-day management of this Policy; coordinating risk assessments, training, and due diligence; receiving and escalating concerns.

Procurement / Supply Chain	Implementing supplier due diligence procedures; incorporating modern slavery requirements into contracts and procurement processes.
Human Resources	Ensuring compliant employment practices; overseeing training delivery; supporting the reporting and investigation process.
All Employees & Workers	Adhering to this Policy; completing required training; reporting any suspicions or concerns promptly and in good faith.

10. Policy Review and Continuous Improvement

This Policy will be reviewed at least annually by the Board of Directors or designated Policy Owner, or sooner if there are material changes to the Company's operations, supply chains, or the relevant legal and regulatory environment.

As part of the review process, the Company will consider:

- The effectiveness of its risk assessment and due diligence processes;
- The outcomes of any concerns raised or investigations conducted;
- Developments in legislation, regulatory guidance, or best practice;
- Feedback from employees, suppliers, and other stakeholders.

11. Key Legislation and Guidance

This Policy has been prepared with reference to the following legislation and guidance:

- Modern Slavery Act 2015
- UK National Referral Mechanism (NRM) — for identifying and supporting victims of modern slavery;
- Home Office: Transparency in Supply Chains guidance;
- UN Guiding Principles on Business and Human Rights (UNGPs);
- International Labour Organization (ILO) Core Conventions on Forced Labour.