

Modern slavery statement for financial year 2024

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Cleveland Cable Company Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cleveland Cable Company Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Cleveland Cable Company was established in 1978, we have over 40 years of knowledge in the Industry and are a global supplier of cables and cable accessories. We deliver complete cable solutions to some of the world's most demanding industries with a portfolio of customers across the world.

The Head Office and principal stocking location is located at Middlesbrough in the North East of England. This site covers an area of twelve acres and includes over 160,000 square feet of warehousing holding stock levels in excess of £120 million to ensure we can always meet the demands of even our largest clients.

Our high risk areas

In General, There are no real areas of high risk. Our supply chain consists of major suppliers with robust policies and procedures working within European and international anti slavery regulations. There is always the chance of risk within our supply chain through their 3rd and 4th tier suppliers in the form of additional support staff (contract cleaners, Caterers etc). These industries, providing labour in the lower wage brackets across the world can fall prey to management who encourage illegal immigrant labour, and "Working cash in hand" in efforts to reduce overhead and increase profits. Cleveland Cable company will refuse to deal with any supplier who in an effort to keep costs down, does not employ a full workforce being paid at least minimum legal wage \ living wage for their country. Existing suppliers that come to our attention for providing illegal or lower than minimum wage labour will be investigated and may have their contract severed.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistle blowing policy.** We operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Ethics Policy.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

Cable Company Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports have been received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Board of Directors on 4th January 2024

Signature



Alastair Powell (Managing Director)
Cleveland Cable Company