

## Modern Slavery & Human Trafficking Statement

CastleOak endeavours to ensure that modern slavery and human trafficking is not taking place directly within its employed workforce or indirectly within any part of its supply chain. This statement is made in accordance with the Modern Slavery Act 2015 and sets out the steps taken by CastleOak over the past 12 months and highlights our plans for the year ahead.

### Our Business

We offer smart solutions for development, construction, funding, manufacturing & aftercare to the care, assisted and retirement living sector and its funders. Our core purpose is to create quality living space; and our company values of excellence, respect, integrity and collaboration guide how we all do business. How we do things is as important as what we do.

### Our Policy

CastleOak takes a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity across all business dealings and relationships, and to implement effective systems and controls to ensure modern slavery is not taking place within its business or across its supply chain.

We are also committed to ensuring transparency across CastleOak and in our approach to tackling modern slavery throughout the supply chain. We expect the same high standards from all our contractors, consultants, suppliers and other partners, and expect our supply chain to impose the same standards on their supply chain.

### Compliance

To ensure compliance with our Policy and that modern slavery does not occur, as far as we are reasonable able, we undertake the following measures:

- Colleagues have been risk assessed for their potential exposure to the possible implications of the Modern Slavery Act. As a result, appropriate training has been delivered, and this will continue.
- CastleOak has broadened the scope of services provided by Safecall to include the reporting of any concerns regarding modern slavery and human trafficking. Safecall is an independent, third-party company who offer a confidential whistleblowing service to report any concerns of malpractice or inappropriate behaviour. We will ensure that Safecall promotional material includes information on modern slavery and human trafficking.
- CastleOak has introduced a Modern Slavery and Labour Exploitation Guide. This is available to all at [www.castleoak.co.uk](http://www.castleoak.co.uk) and is also shared directly with our supply chain. The Guide is part of our subcontract pre-qualification questionnaire and is included in standard subcontract documentation to further ensure awareness and compliance.
- CastleOak promotes the delivery of Tool Box Talks to make site operatives aware of the Modern Slavery Act and the support we offer to ensure modern slavery is not occurring at our sites.
- CastleOak has introduced a contractual obligation that all supply chain partners must confirm their compliance with this Policy.
- CastleOak ensures all subcontractors are registered with ConstructionLine or have completed a pre-qualification process. The supply chain includes, but is not exclusive to, recruitment agencies, sub-contractors, consultants and service providers.
- CastleOak has introduced a Biometrics system to better control access to our sites by only approved individuals with the appropriate accreditations.



**Natalie Richards**

**Head of HR**

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