

# Modern Slavery and Human Trafficking Policy

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Issue Date:	14.03.2024	
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Issued to: (Person/Site)	Ted Soulsby / CID Group	

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# **Review and Amendments**

Below is information relating to the periodic review and amendments made to this document following its original issue.

ACTIONS UNDERTAKEN	DATE	INITIAL
CID Products LLP replaced with CID Trading Ltd	14.03.2023	SE
Reviewed	14.03.2024	SE

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This Modern Slavery and Human Trafficking Policy, sets out CID Trading Ltd objectives in their commitment to support and comply with the applicable requirements of the Modern Slavery Act 2015 throughout its organisation including its supply chains. This will be achieved by attention to the following:

- Relationships: Strengthening our supplier engagement process
- Feedback: Establishing grievance mechanisms and channels for individual worker feedback
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability
- Third party engagement: Building strategic alliances with independent social auditors, unions and NGOs
- Measurable change: Developing verifiable KPIs to measure progress
- Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues
- Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards
- Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking

#### **DUE DILIGENCE PROCEDURES**

We are aware that the largest exposure to Modern Slavery is in our product supply chains, and we have been active particularly over the last decade in minimising this risk in these areas. New suppliers' factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and their factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions are undertaken.

#### **IDENTIFYING, ASSESSING AND MANAGING RISK**

- We set out to identify the extent of any slavery and human trafficking in our supply chains by:
- Conducting spot-checks at supplier factories in China and India
- Engaging third party auditors to conduct social audits at supplier sites

Instituting an annual review questionnaire for existing suppliers to understand suppliers' self-assessment of slavery and human trafficking issues, allowing us to better identify slavery and human trafficking issues as they develop over time and to collect supplier-provided data to track improvement in suppliers' attitudes.

#### **KEY PERFORMANCE INDICATORS**

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

- Staff training levels
- Number of slavery incidents reported in the supply chain
- Training available to staff

A key part of our slavery and human trafficking strategy is to promote cultural change through training.

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## THE SIGNATURE BELOW DEMONSTRATES THAT THIS DOCUMENT HAS BEEN AUTHORISED:

Company Name	CID Trading Ltd
<b>Document Name</b>	Modern Slavery and Human Trafficking Policy
Signed	2000 Common Comm
Print:	Ted Soulsby
Position	Managing Director
Date:	14/03/2024
Review Date:	14/03/2025