



**COPPER & OPTIC  
POLICY ON MODERN SLAVERY  
Issue A Rev 1**



## Policy

### **Objective**

To establish a Code of Business Conduct and Ethics for Copper & Optic Ltd that all employees of the Company shall follow to ensure there is no breach of the UK's Modern Slave Act 2015.

Each area Team Leader and their Manager is responsible for ensuring that any employee under their Supervision understand and comply with this Code. This Code is also applicable to any Suppliers, Consultants, Agents or Representatives that undertake work on behalf of Copper & Optic Ltd.

If any applicable UK Law conflicts with any policy in this Code everyone shall comply with the Law.

If however any foreign custom or policy conflicts with this Code, the Code must be complied with. If any employee has any questions or is unsure of their position their Team Leader or Manager shall be asked for advice on how to handle the situation.

If anyone in the Company knows of any reasons why this Code may not be followed due to any inconsistency or violation of any UK Law they should report the reason to their Team Leader or Manager so the conflict can be corrected.

It is everyone's responsibility in the Company and our Supply chain to comply with this Code.

### **Compliance with Laws, Regulations and Rules**

It is the responsibility of all Copper & Optic Ltd employees including, Directors, Management, Operators, including Temporary Staff, Consultants, Agents and Representatives to comply and respect all UK applicable Laws and follow all laid down Company Procedures including Health & Safety, and Rules stated in the Company Handbook.

It is understood that not all Copper & Optic Ltd employees are expected to know the details of these Laws, Rules and Regulations, however it is everyone's responsibility to make themselves sufficiently knowledgeable to know when to seek advice from their Team Leader or Manager or other appropriate person if they suspect they may be in conflict when performing their job activity.

It is everyone's responsibility to report any suspected violation of this Code or breach of any Law, Rule or Regulation immediately to their Team Leader or Manager, it is also a violation of this Code to assist any person within the Company or Supply chain to break or violate this Code, or applicable Law, Rule or Regulation.

### **Policy Statement**

Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another person or Company for personal or Commercial gain.



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Copper & Optic Terminations Ltd has a zero tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings. We will endeavour to implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business or Supply chain.

Copper & Optic expects our Suppliers to uphold high standards in all business practices and as part of the contracting practice we include prohibitions against the use of any staff sourced from forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Copper & Optic expects our Suppliers to uphold these high standards.

**Responsibility for the Policy**

The Copper & Optic Management Team has primary responsibility for implementing this policy, this includes responsibility for the monitoring of its use and effectiveness.

Management and Supervision within Copper & Optic are responsible for ensuring those employees reporting to them understand and comply with this policy.

Copper & Optic encourage any employee to suggest ways that this policy may be improved or highlight any breaches in procedures or processes that fail this policy.

**Compliance with this policy**

It is a mandatory condition of employment at Copper & Optic that all employees are responsible for the prevention, detection and reporting to Senior Management of any breaches to this policy.

Employees are encouraged to raise concerns of any suspicions of Modern Slavery within our business or Supply chain that may have occurred or may occur in the future, there is also a whistle blowing policy that may be used.

**Communication and Awareness of this policy**

This policy is available on Copper & Optic internal data base and is accessible by all employees.

Any employee may go to their Supervision or Manager and request to view a copy of this policy.

Our zero tolerance to approach to Modern Slavery is communicated to all Suppliers and employees of Copper & Optic at the outset of any business contracts and we expect everyone to comply with our policy on Modern Slavery.

Nobody will be employed by Copper & Optic or become an approved Supplier if they cannot commit and comply with our policy.

**Breaches of this policy**

Any employee who breaches this policy will face disciplinary action that could result in dismissal, if any breaches of this policy are made by a Supplier to Copper & Optic they will be removed from the Company approved Suppliers list.



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Approved on behalf of Copper & Optic Terminations Ltd

Phil Latham  
Managing Director

Date 4th January 2021