

Forced Labour Policy

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Issue #1

Kings Road, Kings Heath,
Birmingham B14 6TN.
t: 0121 444 6060
f: 0121 441 1446
e: sales@castlecartons.co.uk
w: www.castlecartons.co.uk

1. Purpose

This policy outlines Castle Cartons Limited's commitment to preventing forced labour in all aspects of its operations and supply chain. We are dedicated to upholding human rights and complying with all applicable laws.

2. Scope

This policy applies to all employees, contractors, suppliers, and business partners involved in the production, distribution, and sale of our corrugated packaging products.

3. Definition

Forced labour is where work or service is extracted from any person under threat or coercion, or where the person has not offered themselves voluntarily. All Castle Cartons staff are employed under a voluntary employment relationship.

- All employment contracts are entered into voluntarily and based on mutual consent.
- Workers are free to leave their employment after giving reasonable notice, as per contract terms.
- No penalties or threats are imposed for resignation or refusal to work.

Castle Cartons Limited verifies there is an absence of Forced labour Indicators, and confirms that none of the following practices occur:

- Physical or sexual violence
- Bonded labour (e.g., debt repayment through work)
- Withholding of wages, employment fees, or deposits to begin work
- Restriction of movement, including confinement to the workplace
- Retention of passports or identity documents
- Threats of denunciation to authorities

4. Policy Commitments

Castle Cartons Limited commits to:

- Prohibit the use of forced labour in its operations and supply chain.
- Conduct due diligence and risk assessments to identify and mitigate risks.
- Require suppliers to certify compliance with anti-forced labour standards.
- Provide training and awareness programs for staff and suppliers.
- Maintain transparent reporting mechanisms for concerns or violations.
- Investigate all reports promptly and take corrective action where necessary.

5. Policy Documentation

Castle Cartons Limited will keep the following items, and any other documentation deemed necessary to ensure the smooth implementation of the policy, these documents will be subject to appropriate data protection precautions.

- Recruitment practices
- Contract terms
- Wage payment procedures
- Access to personal documents
- Freedom of movement
- Grievance mechanisms

Castle Cartons Limited will also maintain records such as:

- Signed employment contracts
- Payroll records
- Training logs
- Internal audits or HR reviews
- Incident reports (if applicable)

6. Supplier Compliance

To ensure our suppliers are committed to preventing forced labour, all suppliers must:

- Complete a suppliers assessment questionnaire, the information collected is kept on the Z drive of the company network. There is a request for a forced labour policy within this document.
- Demonstrate adherence to international labour standards.
- Allow audits and provide documentation upon request.

7. Monitoring and Auditing

Castle Cartons Limited will perform the following tasks as part of ensuring the policy operates as expected.

- Conduct regular internal and third-party audits.
- Review supplier practices annually.
- Monitor compliance through certifications such as FSC and similar schemes.

8. Reporting and Remediation

Castle Cartons Limited employees and stakeholders may report concerns to their direct manager based on the company structure document. If the issue being raised is with this manager, then issues are to be raised with the manager above.

Reports will be investigated confidentially and without retaliation. If forced labour is identified, we will:

- Terminate relationships with non-compliant suppliers.
- Work to remediate harm to affected individuals.

9. Continuous Improvement

We are committed to ongoing improvement of our labour practices and policies, including annual reviews and updates based on regulatory changes and audit findings.

Signed on behalf of Castle Cartons Limited

James Green
Managing Director