

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

A. POLICY STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2020. Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically, with integrity and transparency in all of its business dealing and relationships, through implementing and enforcing effective systems ensuring that modern slavery and human trafficking are not taking place. This policy applies to all individuals working for Cladmate Facade Systems or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners. We also expect the same high standards from all of our suppliers, contractors and other business partners. As part of our contracting process, it includes specific prohibitions against the use of modern slavery and holds its suppliers to the same standards.

B. RESPONSIBILITY FOR THE POLICY

Our board directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The compliance manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. We invite comments on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the compliance manager.

C. COMPLIANCE WITH THE POLICY

Cladmate Facade Systems understands that it is our responsibility to prevent, detect and report any signs or act of modern slavery in any part of our business or supply chain. Thus, we avoid any activity that might lead to a breach of this policy.

Company's supply chains constitute any of the various forms of modern slavery, please raise it with your line manager. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment or victimisation as a result of reporting in good faith. Their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

D. COMMUNICATION AND POLICY AWARENESS

To ensure a high level of understanding of modern slavery and human trafficking in our supply chains and our business, regular training on this policy will be provided if necessary. The training will provide insight into how to identify exploitation and modern slavery and how to report suspected cases.

E. BREACH OF POLICY

We have zero tolerance approach to slavery and human trafficking in accordance with our Policy. Therefore, any employee who breaches this policy will face disciplinary action and a summary dismissal for gross conduct. We may take further action into the policy breach and terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.



Cumhuri KANTARCI

Managing Director

17.05.2021

