

**Carbon Gold Ltd**

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Email: [info@carbongold.com](mailto:info@carbongold.com)Website: [www.carbongold.com](http://www.carbongold.com)**Modern slavery and human trafficking policy statement**

This statement sets out Carbon Gold's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2021

Carbon Gold is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

**Carbon Gold's Structure**

Carbon Gold was originally established to help promote the use of biochar in mitigating against climate change and to support sustainable food production through the development of biochar-based, peat free, organic soil additives.

Following a few years of incredible results from third party trials looking into our enriched biochar's effect on plant health, our natural organic biochar products were quickly adopted by the commercial crop growing, tree care and sports turf sectors. Upon completion of a successful crowd funding programme at the end of 2020, Carbon Gold undertook a rebranding process specifically aimed to take the product to the wider, domestic retail sector, bringing access to our biochar products to everyone and not just the commercial/professional growers.

**Our Supply Chain**

Carbon Gold as a small business sources a wide range of products and services from around 20 national and international suppliers. Our supply chain spans a variety of industry sectors, which can be broadly grouped as follows:

- Component and raw materials
- Production, manufacturing, and distribution
- Professional services

Carbon Gold is committed to comply with all applicable laws and regulations as well as conducting its interactions with its supply chain in a fair, transparent and professional manner at all times.

### **Policies and Controls**

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** – we encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chain of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblower procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or otherwise who have concerns can contact any of our senior management team in confidence.
- **Procurement Policy** – we are committed to ensuring that our suppliers adhere to the highest standards of ethic. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.
- **Recruitment** – we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers.

### **Supply Chain Controls**

Factors and controls in place that reduce the risk of slavery in our supply chain are as follows:

Our Whistleblowing Policy encourages individuals to report any wrongdoing, which extends to slavery and human trafficking. All Whistleblowing reports are treated in the strictest confidence and are investigated fully with appropriate remedial actions taken.

We expect companies who supply us to be compliant with all applicable laws relating to slavery and human trafficking, to undertake their own due diligence on their own supply chains and business partners, and to ensure that any contracts with their sub-contractors have similar obligations.

Large companies subject to the Act will be expected to provide slavery and human trafficking statements for our records and review.

### **Employee Controls**

We ensure that all pay and conditions of our direct employees are of a high standard, above those stipulated in the Act.

Any unpaid work experience will be closely controlled in liaison with the appropriate third party.

### **Awareness-raising programme**

Our intention during 2021/22 is to raise awareness of modern slavery issues with our staff and supply chain. This should include details of the basic principles of the Modern Slavery Act 2015. How employers can identify and prevent slavery and human trafficking and what employees can do to flag up potential slavery or human trafficking issues to the relevant parties and what external help is available, for example through the Modern Slavery Helpline.

### **Who is responsible for ensuring compliance**

The senior management team of Managing Director and Head of Finance & Operations are responsible for ensuring compliance with these requirements.

This statement was approved by the organisation's Board who will review and update it annually.

Approved.....

Name & Position.....M. HARTSHORN (MANAGING DIRECTOR)

Dated.....8-6-21