



## **Modern Slavery and Human Trafficking Policy Statement**

### **Introduction**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2020.

The statement sets down Celtic Energy Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

### **Organisational structure and supply chains**

Celtic Energy Limited "the company" is a leading surface mining company with its current activities being carried out solely within the UK, in South Wales.

Whilst we do not export ourselves, we sell to UK and other country buyers who do export. Those countries are Norway, Germany, France, Belgium, Ireland and Holland.

The company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intent to act ethically in our business relationships.

This policy takes into account, and supports, the policies, procedures and requirements documented in our company handbook.

The company will achieve these aims by our initiative to identify and mitigate risk in the following, but not limited to, ways:-

### **Training**

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the company provides training to relevant members of staff.

### **Whistle Blowing**

The company encourages all of its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

## **Risk Assessment**

The Directors of Celtic Energy Limited will take into account the extent of the Company's exposure to potential risks in relation to slavery and human trafficking by organisations acting on its behalf or by people associated with it. This assessment will be reviewed and discussed at Board meetings as and when deemed appropriate to assess any changes to markets, supply chains etc and will be both informed and documented.

## **Due Diligence Processes**

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The company applies the following procedures:

- We require all new and existing members of our supply chain to comply with the Modern Slavery Act.
- If a supply chain member does not comply or is convicted of any offence in relation to this activity then they will be removed from our supply chain.

## **Monitoring and Review**

We use the following key performance indicators (KPI's) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including:

- Completion of Audits by Directors, Managers, Safety Managers and Safety Advisors;
- Use of labour monitoring and payroll systems; and
- Level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. Celtic Energy Limited's Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name:



Position:

William Watson  
Chief Executive Officer

Date:

4<sup>th</sup> June 2019