CAPITA

Human Rights and Labour Conditions Policy

Human rights

Capital Reinforcing is committed to protecting the human rights of all employees. The Company's position on human rights reflects the core requirements of the Universal Declaration of Human Rights, such as freedom from torture, unjustified imprisonment, unfair trial and other oppression. Other central tenets are freedom of expression, religion and political or other representation.

Capital Reinforcing supports the protection of international human rights within the sphere of our influence, and will not be complicit in human rights abuses.

Labour conditions

The Group observes the ILO Declaration on Fundamental Principles and Rights at Work which upholds basic values in four areas:

- Forced Labour

We will not tolerate forced labour, bonded labour or labour which involves physical or mental abuse, including actual or threatened physical punishment, verbal or sexual harassment, or domination or restraining of workers by force, authority or threats.

Workers must not be required to lodge "deposits" or their identity papers with their employer, and they must be free to leave their employer after reasonable notice.

- Child Labour

Exploitation of child labour is unacceptable under any circumstances.

No person under the minimum legal working age applicable to their country may be employed by any company within the Group.

- Freedom of Association and the Right to Collective Bargaining

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

All Group companies must adopt a non-discriminatory attitude towards the activities of trade unions and their organisational activities.

Workers' representatives must not be discriminated against and must have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the supplier will facilitate and not hinder the development of parallel means for independent and free association and bargaining

- Discrimination

Group companies must not discriminate in hiring, compensating, access to training, promotion, termination or retirement based on race, caste, national origin, colour, religion, age, disability, gender, sexual orientation, union membership or political affiliation. (See Equal opportunities policy)

Responsibility

We believe that everyone in our organisation is responsible for having due regard for human rights. In particular:

- The Managing Director has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed;
- Managers and supervisors must provide visible leadership that promotes human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur;
- All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses.

Slavery and Human Trafficking Statement

Capital Reinforcing's turnover does not fall above the level required to make a Slavery and Human Trafficking statement, therefore does not issue one in accordance with the Modern Slavery Act.

Capital Reinforcing however condones slavery and human trafficking and has issued an Ethnical Supply Chain Policy which should be read in conjunction with this policy.

This Policy will be reviewed annually.

Signed:

Remet Owen

Dermot Owens Managing Director