

Financial Years 2016 and 2017 – Statement on The Modern Slavery Act 2015

This statement is in accordance with Section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps which the Company has taken, and will take to ensure Slavery and Human Trafficking is not, and does not take place in it's supply chains or in any other part of it's business.

General Statement

Whilst the provision of goods, services and raw material to the Company is a diverse and complex operation, there are robust management systems in place to ensure the company's ethical standards and policies are applied, to ensure legal compliance both within the UK and overseas.

Supplier Standards

As a part of the procurement process, a preferred supplier listing and a multi-level purchase approval system are in place prior to any order or contract being approved.

Furthermore, the company's values and standards are clearly defined through ISO Certification in Management, Safety, Environmental and Energy Management, which together with the following comprehensive policy documents dictate the ethical standards required from all staff and suppliers:

- Corporate Responsibility Policy
- Ethics and Values Policy
- Equality and Diversity Policy
- Bribery and Corruption Policy
- Modern Slavery and Human Trafficking Policy

Primary Verification Process

In addition to the above tender process and policy documents, the primary approach to ensure continued legal compliance with the Act is through increasing procurement with established and proven ethical suppliers from low risk countries.

The risk level is determined through risk assessments which are based upon:

- Geographical location
- Service provision
- Materials or services supplied
- Previous association with the Company

Based on these assessments it is not currently considered that any of the Company's suppliers fall within a high risk category.

Secondary Verification Process

In addition to the primary assessment process a secondary check will be introduced over the

coming months. This will take the form of self-certification and declaration programme.

The self-certification programme will require suppliers to both confirm their understanding of the Company's standards, and declare their compliance with the Modern Slavery Act 1995.

It will also require suppliers to verify the steps they have taken to ensure they carry out due diligence assessments of their own suppliers and 3rd parties.

Non Compliance

In the avoidance of any doubt, it is mandatory that any organisation or individual working with or for the Company, including all sub-contractors, full comply and abide by the legislative requirements in relationship to:

- The Modern Slavery Act 2015
- An Individual's Right to Basic Working Conditions
- An Individual's Human Rights
- The Organisations Corporate Responsibility
- An Individual or Protected Group's Equality of Treatment
- The Bribery Act 2012
- The Health & Safety at Work Act 1974
- All Environmental Requirements and Acts

A zero tolerance approach will be taken where these responsibilities are not met, and as such, we reserve the right to immediately terminate the relationship with any 3rd party if issues of non compliance are identified, and where such matters are not addressed in a timely manner.

Summary

The Company is fully committed to preventing involvement with any organisation directly or indirectly involved in Modern Slavery, Human Trafficking or Child Labour.

It will commit to ensuring business is only conducted with ethically sound and compliant suppliers.

To ensure these standards are maintained the Company will monitor current and new suppliers through a process of due diligence assessments, risk assessments and self-certification requirements.