

Modern Slavery Policy

1.0 PURPOSE AND SCOPE

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship, in line with the Modern Slavery Act 2015 (MSA).

This policy applies to all permanent and temporary employees of the Company. It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, Directors, agency workers, casual workers, contractors, consultants, agents and suppliers (“associated persons”). All employees and associated persons are expected to adhere to the principles set out in this policy.

2.0 WHAT DO WE MEAN BY MODERN SLAVERY?

Though modern slavery can take many forms, the MSA forbids the employment of anyone under conditions of:-

- i)* **Slavery** [where ownership is exercised over an individual].
- ii)* **Servitude** [the obligation to provide service imposed by coercion].
- iii)* **Forced & compulsory labour** [work/service not voluntarily performed, obtained from an individual either under threat of force or penalty].
- iv)* **Human trafficking** [arranging/facilitating the travel of another with a view to exploit them].

Other forms that we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to, **child labour**.

3.0 HOW WE SEEK TO EMBED OUR ANTI-SLAVERY POLICY IN PRACTICE

Instarmac is committed to understanding modern slavery risks and ensuring that there is no modern slavery in our own business and supply chains.

We confirm that the organisation complies with all applicable anti-slavery and human trafficking laws, in particular, but not limited to, the Modern Slavery Act 2015. This includes compliance with the principles of the Ethical Trade Initiative as set out in our Ethical Trading Policy. The principles of the Ethical Trading Initiative may be found at <http://www.ethicaltrade.org/eti-base-code>, as summarised below:-

1. Employment is freely chosen.
2. Freedom of association and the right to collective bargaining are respected.
3. Working conditions are safe and hygienic.
4. Child labour shall not be used.
5. Living wages are paid.
6. Working hours are not excessive.
7. No discrimination is practiced.
8. Regular employment is provided.
9. No harsh or inhumane treatment is allowed.

3.1 Policies in relation to modern slavery

We recognise that having the right policies in place and ensuring they are implemented effectively is fundamental to managing the risk of modern slavery in our business and supply chains. Instarmac have developed a suite of policies that relate to ensuring ethical business practices are followed and these are supported by further procedures and guidance.

- Recruitment & Selection Policy
- Equality Policy
- Supplier Profile Questionnaire
- Modern Slavery Policy
- Ethical Trading Statement
- Code of Conduct for Suppliers
- Whistleblowing Policy
- Behavioural Partnership Policy
- Corporate Social Responsibility
- Bribery Policy

All the above reflect our commitment to acting ethically and with integrity in all our business relationships.

We have zero tolerance to modern slavery and expect both current and future suppliers to comply with our values and to operate in an ethical, legally compliant and professional manner. We also expect our suppliers to promote similar standards in their own supply chain.

3.2 Due Diligence

To support our policy commitments, we will implement the following measures over the course of each financial year:

- We have, and will continue to, conduct regular audit's through our Supplier Profile questionnaire and close business relationships to determine which parts of our own business and our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, as informed by our risk assessment/audit, we will engage directly with new suppliers in respect of our policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains, and, where appropriate, agree how such measures should be enhanced.
- As part of our initiative to identify, and mitigate against, such risks we nominate senior managers who in turn report any issues of concern to the Board of Directors. The nominated persons will ensure our systems are monitored to maintain compliance to all identified policies and processes, as outlined in section 3.1.
- If we were to find evidence that any associated person has failed to comply with the Modern Slavery Act 2015 then we would require them to remedy such non-compliance. We reserve the right to report such suspicions, provide appropriate information to the relevant authorities and to suspend or terminate any associated business arrangement or contract.

3.3 Looking Ahead

Over the course of the next financial year we will continue to enhance our procedures and processes to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers. We will also look at increasing employee awareness of this policy beyond those not directly involved with our supply chain.

4.0 RESPONSIBILITY FOR THIS POLICY

It is the responsibility of everyone to recognise and report any activity or situation that could be construed as contrary to the principles outlined above. Senior Managers will be responsible for raising any such non conformance(s) to the Board of Directors.

The Board of Directors have overall responsibility for this policy and in ensuring wherever possible that the Company complies with all its legal and ethical obligations and in ensuring remedial action is taken in regards to known issues.

This policy 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 31 September 2019. It has been approved by Instarmac Group plc Board of Directors, and signed by the Managing Director, and will be reviewed on a regular basis.

This policy is authorised by



JOHN HOLCROFT

MANAGING DIRECTOR, October 2018