

Modern Slavery and Human Trafficking Policy

1.0 PURPOSE AND SCOPE

This policy sets out Instarmac Group Plc'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 is made pursuant to section 54(1) of the Modern Slavery Act (MSA) 2015 and constitutes Instarmac's slavery and human trafficking statement for the 2019-2020 financial year which ended on 30th September 2020 and relates to actions and activities during this period.

In previous years, our organisation has published its statement no later than 1st December. We recognise that we are publishing this statement later than expected. This is because of reduced staff capacity during the coronavirus pandemic.

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 2015 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

As part of the manufacturing industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

Our organisation 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.

We confirm that Instarmac Group plc 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>.

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. 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:

- 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 encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Our policies makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

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.

Our Modern Slavery Policy statement is available on the Company website and also on our internal intranet for employees.

3.2 Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to be compliant with the requirements of ISO 9001 and be able 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.
- We have, and will continue to, conduct regular audits through our Supplier Profile questionnaire.
- 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, take steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans and in ensuring their policy is regularly reviewed and updated.
- 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 where there are serious violations.

2019-2020 Review

Following the annual review of our policy and supply chain, we continue to operate a supply chain with a low inherent risk of slave and human trafficking potential. Nevertheless, this assessment is kept under continual review and due diligence is conducted with any new suppliers (as outlined above). Any suspected instances of slavery and human trafficking will be fully investigated.

In addition to the above suite of policies we have developed the following anti-slavery initiatives as follows:-

- We continue to monitor and maintain our TISC (Transparency In Supply Chain) Report.
- During 2019-2020 we continued to provide awareness to all new employees on the MSA and our Modern Slavery and Human Trafficking Policy, as part of our onboarding programme to help employees better understand and respond to the identified slavery and human trafficking risks.

- As well as training staff, we have raised awareness of modern slavery issues through newsletters and bulletins to explain to staff:
 - the basic principles of the Modern Slavery Act 2015;
 - how employers can identify and prevent slavery and human trafficking;
 - what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organization.
- During 2019-2020 no instances of modern slavery were reported or identified.

3.3 Looking Ahead

Over the course of the next financial year we will continue to take positive steps 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 continue to only use specified, reputable employment agencies to source labour and where appropriate verify the practices of any new agency. We will continue to only engage with suppliers whom can demonstrate they are certified to ISO 9001 and are able to demonstrate that they have a modern slavery statement and/or policy in place that meets the required standards as pertained in this policy.

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 30th September 2020. 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



Mark Shorrock
MANAGING DIRECTOR, April 2021