

Modern Day Slavery Act 2015 Policy Statement

Spintec Metal Spinning Ltd. recognizes that slavery and human trafficking remains a hidden blight on our global society.

The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Company activities are varied through multiple disciplined areas and sectors such as: Engineering, Civils and construction packages.

Likewise we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business

Our **Anti-slavery Policy Statement** reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2008, soon we will be certified to ISO 9001 : 2015 The implementation and operation of this management system underlines our commitment to this policy statement.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (But not limited to):-

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work;
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in Slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values
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To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. The Directors have been briefed on the subject.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

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

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

We will on no account deal with any organization should it have an idea that they are contravening legislation based around this Act.

This policy applies to all of those who work for Spintec or are suppliers to Spintec Metal Spinning.

Signed

A handwritten signature in black ink, appearing to read 'S. Nichol'.

Director