

ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY **(the Policy)**

Purpose of this Policy

The Anti-Modern Slavery and Human Trafficking Policy has been introduced to combat slavery and human trafficking. In addition to creating new criminal offences, powers of enforcement and measures to protect victims, it introduces requirements intended to eliminate slavery and trafficking in global supply chains.

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in many forms including servitude, forced or compulsory labour and human trafficking, all of which deprives a person of their freedom and/or exploits them for personal or commercial gain.

The Alumasc Group has a zero-tolerance approach to modern slavery and is committed to act ethically and comply with all laws and regulations, which are relevant to the Group's businesses and in all countries where the Group operates and those of the Group's suppliers. The Group expects its suppliers to hold their own suppliers to the same high standards.

Responsibility

The Board of Directors has overall responsibility for ensuring this policy complies with legal and ethical obligations.

Senior Management within each Group business is responsible for ensuring those reporting to them understand and comply with this policy and are provided with regular awareness updates and training if required. Training is made available online in the divisions and training slides are available to explain the Policy and provide advice on the signs that could indicate Modern slavery, may be taking place.

It is the responsibility of each individual to familiarise themselves with both the Policy and the Modern Slavery Act 2015, and to request further details from their line manager if required.

Prevention of Modern Slavery and Human Trafficking

The Alumasc Group is committed to have a transparent approach to ensure that its businesses and supply chains adhere and comply with the prevention of any aspect of slavery, as set out in the Modern Slavery Act 2015. In line with Government guidelines, we recognise the right of freedom of movement and of workers' rights to leave employment. Our other policies in the Group prohibit discrimination, child labour, and any threats of violence or intimidation. No employee will ever have their passport or original identity documents withheld.

The Group already has controlled processes in place to ensure its businesses comply with statutory regulations. The Group acknowledges that it does not hold the same control over the conduct of its supply chain operations. To strengthen its compliance the Group expects its businesses, where relevant, to:

1. Conduct risk assessments (Audit) to determine which parts of its business and which of its suppliers are most at risk to modern slavery, subject to the restrictions following the Covid-19 pandemic, so that efforts can be focused on those areas. Those risk assessments will be reviewed annually to ensure that any changes to the supply chain are reflected.
2. Engage with its risk assessed suppliers both to convey to them the Group's Anti-Modern Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and to request that they uphold the standards. We ask our suppliers to complete due diligence questionnaires, where possible, and these are used to confirm compliance with our standards.
3. Where appropriate, as informed by individual business risk assessments, seek to introduce supplier pre-screening and self-reporting for suppliers on safeguarding controls.
4. Introduce contractual provisions for the Group's suppliers (where possible) to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationship both routinely and at times where there is reasonable suspicion.
5. To ask all employees to be vigilant, in particular to use the International Labour Organization (ILO) indications to identify forced labour such as: abuse of vulnerability, deception, restriction of movement and/or association, isolation, physical violence and intimidation and/or threats, retention of identity documents, others having their wages withheld, abuse, living conditions and people wanting to work excessive overtime.
6. Subject to the restrictions caused by the Covid-19 pandemic to use social audits, or observations by staff, external third parties, suppliers' staff or their third party that are either announced or unannounced to identify if there are signs of modern slavery.
7. The performance of this Policy will be measured by the number of people trained within the business and on induction and by reviewing progress with selected supplier visits or audits.

The Alumasc Group includes in the company's Annual Report and Accounts a reference to the Group's Anti-Modern Slavery and Human Trafficking Statement. The Statement will also be published on the Group's website and will be updated annually. For those individual legal entities with sales currently greater than £36m a statement will also be made on the constituent websites.

Reporting Modern Slavery and Human Trafficking

The detection and reporting of any aspect of slavery is the responsibility of all employees.

Individuals can report or discuss any concerns about suspected slavery associated with the company or its suppliers by reporting the matter to their line manager or by using The Alumasc Group's Whistleblowing Policy.

Whistleblowing reporting can be by:

- Making a disclosure face to face or in writing to the Group Company Secretary.
- Calling the confidential hotline on 01536 383812. This line will only be answered by the Group Company Secretary. If that person is not available, you can either leave a message on the confidential answer phone or email the Company Secretary.

All reported concerns will be investigated in the first instance by the Group Company Secretary.

The Group Company Secretary will decide what action to take when a full investigation has been concluded and documented in writing.

Policy Review

This Policy will be reviewed from time to time and, in particular, where there is a change in legislation. Any amendments will be notified in writing.

Alumasc's policies, contractual and procurement arrangements, operate to ensure we have effective systems and controls to ensure modern slavery is not taking place in our business or supply chain. Our staff handbook makes it clear staff need to behave ethically and operate with integrity at all times. In the event that our staff have a concern about the activities of a client or supplier they are able to do so without risk to their position under our Whistleblowing Policy.