

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Modern Slavery & Human Trafficking Act 2015 Section 54

Introduction

As an organization with turnover of less than £36m, Pyropress Limited is not statutorily required to produce and maintain a modern slavery and human trafficking statement. Nevertheless, the Company values its reputation and is committed to upholding the highest level of ethical standards in the conduct of its business affairs. The purpose of this document is to set out the Company's policy in relation to Modern Slavery. The policy applies strictly to all employees, directors, agents, consultants, contractors and suppliers.

Pyropress Commitment

Pyropress expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- A zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk-based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- As part of our Suppliers application process (due diligence) we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

Penalties

The Modern Slavery Act came into force in 2015. Under that Act, Slavery and Human trafficking is punishable by imprisonment and/or an unlimited fine. If the Company is found to have taken part in the Slavery or trafficking or is found to lack adequate procedures to prevent, it too could also face an unlimited fine as well as the disqualification of directors under the Company Directors Disqualification Act 1986.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the Individual and/or the Company and its Directors.

Policy

Pyropress will not tolerate Slavery or trafficking in any form.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Pyropress strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Key Risk Areas

Employment of suppliers and sub-contractors are the main risk areas associated with the enforcement of the policy.

Suppliers: During the application process we will request confirmation that the suppliers fulfil the responsibilities of the Modern Slavery Act 2015.

Actions by third parties for which the Company may be held responsible can include a range of people i.e. agents, contractors and consultants, acting on the Company's behalf. Appropriate due diligence should be undertaken before a third party is engaged.

Evidence of Conformance: Pyropress maintains a record of Supplier applications.

Employee responsibility and how to raise a concern

The prevention, detection and reporting of Slavery or Trafficking is the responsibility of all Employees, Sub-contractors, Contractors and Directors of the Company. If you become aware or suspect that an activity or conduct impacts upon our responsibility, there is a duty to report this to a Director of the Company or, if you still have concerns, the appropriate authorities.

Training

Stakeholders and members of Pyropress personnel involved in supplier or sub-contractor employment will be directed to the requirements of this policy; the Quality Manager will facilitate training delivery on the topic as deemed appropriate.

References:

1. Modern Slavery & Human Trafficking Act 2015 Section 54
HM Government UK, *Modern Slavery & Human Trafficking Act 2015 Section 54*, The National Archive, viewed 03rd February 2020, <<http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>>
2. Transparency in supply chains: a practical guide. Updated 18 December 2019
UK Home Office, *Transparency in supply chains: a practical guide, updated 18 December 2019*, GOV.UK, viewed 03rd February 2020, <<https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide>>

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