

DECEMBER 2016

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**ANTI-SLAVERY & HUMAN TRAFFICKING**

**POLICY CONTENTS**

**CLAUSE**

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## 1. POLICY STATEMENT

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner which does not violate the fundamentals of human rights. Modern Slavery is a crime and violation of individual's human rights can take various forms, such as slavery, forced, bonded and compulsory labour & human trafficking, all of which have in common the deprivation of an individual's liberty by another individual or organisation in order to exploit them for personal or commercial gain. We take a zero-tolerance approach to modern slavery and human trafficking and as such we are committed to acting ethically, professionally, fairly and with the highest integrity across all our business dealings and relationships wherever we operate. We endeavour to enforce effective systems and controls to ensure modern slavery or human trafficking is not taking place within our business or in any of our supply chains.
- 1.2 We will uphold all laws relevant to countering Anti-slavery & Human Trafficking, in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Modern Slavery Act 2015, in respect of our conduct both at home and abroad. We expect the same high standards from all of our contractors, suppliers and other business partners.  
The purpose of this policy is to:
- 1.3
- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on Anti-Slavery & human Trafficking; and
  - (b) provide information and guidance to those working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, placement students, contractors, consultants, third party representatives and business partners on how to recognise and deal with anti-slavery bribery and corruption issues.
- 1.4 Modern Slavery & Human Trafficking are punishable by imprisonment and therefore we take our legal responsibilities very seriously.

## 2. WHO IS RESPONSIBLE FOR THE POLICY?

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The HR Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training and awareness on it.

3. **WHO IS COVERED BY THE POLICY?**

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **workers** in this policy).

4. **WHAT IS MODERN SLAVERY - EXTRACT FROM “MODERN SLAVERY ACT 2015”**

<p><b>1 Slavery, servitude and forced or compulsory labour</b></p> <p>(1) A person commits an offence if –</p> <ul style="list-style-type: none"> <li>(a) the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or</li> <li>(b) the person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.</li> </ul> <p>(2) In subsection (1) the references to holding a person in slavery or servitude or requiring a person to perform forced or compulsory labour are to be construed in accordance with Article 4 of the Human Rights Convention.</p> <p>(3) In determining whether a person is being held in slavery or servitude or required to perform forced or compulsory labour, regard may be had to all the circumstances.</p>
<p>(4) For example, regard may be had –</p> <ul style="list-style-type: none"> <li>(a) to any of the person’s personal circumstances (such as the person being a child, the person’s family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons;</li> <li>(b) to any work or services provided by the person, including work or services provided in circumstances which constitute exploitation within section 3(3) to (6).</li> </ul> <p>(5) The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude, or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.</p>

## 5. WHAT IS HUMAN TRAFFICKING – EXTRACT FROM “MODERN SLAVERY ACT 2015”

<p><b>2 Human trafficking</b></p> <p>(1) A person commits an offence if the person arranges or facilitates the travel of another person (“V”) with a view to V being exploited.</p> <p>(2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).</p> <p>(3) A person may in particular arrange or facilitate V’s travel by recruiting V, transporting or transferring V, harbouring or receiving V, or transferring or exchanging control over V.</p> <p>(4) A person arranges or facilitates V’s travel with a view to V being exploited only if –</p> <p style="padding-left: 20px;">(a) the person intends to exploit V (in any part of the world) during or after the travel, or</p> <p style="padding-left: 20px;">(b) the person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel.</p> <p>(5) “Travel” means –</p> <p style="padding-left: 20px;">(a) arriving in, or entering, any country,</p> <p style="padding-left: 20px;">(b) departing from any country,</p> <p style="padding-left: 20px;">(c) travelling within any country.</p> <p>(6) A person who is a UK national commits an offence under this section regardless of –</p> <p style="padding-left: 20px;">(a) where the arranging or facilitating takes place, or</p> <p style="padding-left: 20px;">(b) where the travel takes place.</p> <p>(7) A person who is not a UK national commits an offence under this section if –</p> <p style="padding-left: 20px;">(a) any part of the arranging or facilitating takes place in the United Kingdom, or</p> <p style="padding-left: 20px;">(b) the travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.</p>
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## 6. YOUR RESPONSIBILITIES / COMPLIANCE WITH THE POLICY

- 6.1 You must ensure that you read, understand and comply with this policy.
- 6.2 The prevention, detection and reporting of modern slavery & human trafficking is the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.3 You must notify your manager, the HR Manager or the Board of Directors as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 6.4 If you are unsure about whether a particular act, the treatment of workers or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of modern slavery you must raise it with your Manager or the HR Manager immediately.
- 6.5 If you believe or suspect a breach of this policy has occurred or it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

## 7. HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes breach of the modern slavery act 2015, or if you have any other queries, these should be raised with your line manager, the HR Manager or a member of the Board of Directors. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of our Whistleblowing Policy can be obtained from the HR Department.

## 8. PROTECTION

- 8.1 We aim to encourage openness and will fully support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or human trafficking of whatever form is or may be taking place in any part of our business or in any of our supply chains. Detrimental treatment includes disciplinary action, dismissal, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance procedure.

## 9. TRAINING AND COMMUNICATION

- 9.1 Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.
- 9.2 Our zero-tolerance approach to modern slavery and human trafficking will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## 10. MONITORING AND REVIEW

- 10.1 The HR manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering modern slavery and human trafficking.

- 10.2 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.
- 10.3 Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR Manager.
- 10.4 This policy does not form part of any employee's contract of employment and it may be amended at any time

## **11. BREACHES OF THIS POLICY**

- 11.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct
- 11.2 We may terminate our relationships with other individuals and organisations working on our behalf if they breach this policy.

## **SLAVERY & HUMAN TRAFFICKING**

### **STATEMENT INTRODUCTION FROM THE BOARD**

We are committed to driving out acts of modern day slavery and human trafficking and as such we endeavour to improve our practices to combat slavery and human trafficking across all our global businesses.

### **OUR BUSINESS**

Our business manufactures Engineering Plastics in Leicester, (UK), Johannesburg (SA) and Changshu (China) with offices in Lebanon and Houston (USA). Nylacast sells to a customer base across 45 countries throughout the world.

### **OUR SUPPLY CHAINS**

Our supply chains include obtaining chemicals, tooling, materials, machinery and packaging equipment. We also work with contractors who supply engineers or consultants for projects. The company will not support, deal, partner or work alongside any business knowingly involved in Modern Slavery or human trafficking.

### **RESPONSIBILITY**

The Company Directors and Senior Management shall take responsibility for implementing this policy statement, its objectives and shall provide adequate training and awareness to ensure that modern slavery and human trafficking is not taking place within any of its businesses or supply chains.

### **OUR POLICIES ON SLAVERY & HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our businesses and as far as is possible we require our suppliers to hold similar ethical standards and practices.

### **PROTECTION PROCESS FOR EMPLOYEES**

We have in place a policy to protect whistle blowers who highlight to us any risk of modern slavery or human trafficking within our business.

### **TRAINING**

To ensure that there is a high level of understanding of the risks of modern slavery and human trafficking in any of our businesses or supply chains we aim to develop awareness around this and as such train our staff.

### **NEXT STEPS**

This Policy statement will be reviewed & published annually. This statement is made pursuant to the Modern Slavery Act 2015.