

MODERN SLAVERY and HUMAN TRAFFICKING POLICY

Purpose of this Policy

The 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 in order to exploit 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.

It is the responsibility of each individual to familiarise themselves with both the policy and the Modern Slavery Act 2015. If further details are required employees are requested to raise them with their line manager.

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.

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 so that efforts can be focused on those areas.
2. Engage with its suppliers both to convey to them the Group's Modern Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.
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 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.

From the financial year ending 30 June 2016 The Alumasc Group will include in the company's Annual Report and Accounts a reference to the Group's Modern Slavery and Human Trafficking Statement. The Statement will also be published on the Group's website and will be updated periodically. 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, using The Alumasc Group's Whistleblowing Policy. This 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 Deputy Group Company Secretary. If that person is not available, you can either leave a message on the confidential answer phone or ring back at a later date.

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.