



# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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## PURPOSE

The purpose of this policy is to:

- Set out our responsibilities, and of those working for us, in observing and upholding our position on Anti-Slavery and Human Trafficking; and
- Provide information and guidance to those working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency employees, placement students, contractors, consultants, third party representatives and business partners on how to recognise and deal with anti-slavery bribery and corruption issues.

Modern slavery and human trafficking are punishable by imprisonment and therefore Nylacast take our legal responsibilities very seriously.

## SCOPE

Nylacast will uphold all laws relevant to countering Anti-slavery & Human Trafficking, in all the jurisdictions in which Nylacast operate. However, Nylacast remain bound by the laws of the UK, including the Modern Slavery Act 2015, in respect of our conduct both at home and abroad. Nylacast expect the same high standards from all our contractors, suppliers, and other business partners.

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-employees, casual employees 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 employees in this policy).

## REFERENCE DOCUMENTS

- Grievance policy
- Whistleblower policy

## RESPONSIBILITY

Nylacast will uphold all laws relevant to countering Anti-slavery and Human Trafficking, in all the jurisdictions in which Nylacast operate. However, Nylacast remain bound by the laws of the UK, including the Modern Slavery Act 2015, in respect of our conduct both at home and abroad. Nylacast expect the same high standards from all our contractors, suppliers, and other business partners.

## POLICY

It is our policy to conduct all 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 and human trafficking, all of which have in common the deprivation of an individual's liberty by another individual or organisation to exploit them for personal or commercial gain.

Nylacast take a zero-tolerance approach to modern slavery and human trafficking and as such Nylacast are committed to acting ethically, professionally, fairly and with the highest integrity across all our business dealings and relationships wherever Nylacast operate. Nylacast 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.

We are committed to addressing any concerns related to child labour, forced labour, or human trafficking. We maintain a grievance mechanism, through our Grievance Policy. Employees, contractors, or any other stakeholders who suspect or encounter instances of these violations within our business or supply chains are encouraged to follow this grievance procedure.

### WHAT IS MODERN SLAVERY - EXTRACT FROM 'MODERN SLAVERY ACT 2015'

1. *Slavery, servitude and forced or compulsory labour.*
  - (1) *A person commits an offence if:*
    - (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*
    - (b) *The person requires and other person to perform forced or compulsory labour and the circumstances are such that the other person is being required to perform forced or compulsory labour.*
  - (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.*
  - (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.*
  - (4) *For example, regard may be had:*
    - (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.*
    - (b) *To any work or services provided by the person, including work or services provided in circumstances which constitute exploitation with section 3(3) to (6)*
  - (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 being held in slavery or servitude, or required to perform forced or compulsory labour.*

## WHAT IS HUMAN TRAFFICKING - EXTRACT FROM 'MODERN SLAVERY ACT 2015'

### 2. Human trafficking

- (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.
- (2) It is irrelevant whether V consents to the travel (whether V is an adult or a child).
- (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.
- (4) A person arranges or facilitates V's travel with a view to V being exploited only if:
  - (a) The person intends to exploit V (in any part of the world) during or after the travel, or
  - (b) The person knows or ought to know that another person likely to exploit V (in any part of the world) during or after the travel.
- (5) 'Travel' means:
  - (a) Arriving in, or entering any country
  - (b) Departing from any country
- (6) Travelling within any country. A person who is a UK national commits an offence under this section regardless of:
  - (a) Where the arranging or facilitating takes place or
  - (b) Where the travel takes place
- (7) A person who is not a UK national commits an offence under the section if:
  - (a) Any part of the arranging or facilitating takes place in the United Kingdom, or
  - (b) The travel consists of arrival in or entry into, departure from, or travel within, the United Kingdom.

## HOW TO RAISE A CONCERN

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes breach of the modern slavery act 2015, or if they have any other queries, these should be raised with their 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 Whistleblower Policy. A copy of our Whistleblower Policy can be obtained from the HR Department.

## PROTECTION

Nylacast aims to encourage openness and wilfully support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Nylacast are committed to ensuring no one suffers any detrimental treatment because 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 the procedures set out in our Grievance Policy.

## BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationships with other individuals and organisations working on our behalf if they breach this policy.

## COMPLIANCE

The employee must ensure that they have read, understood, and comply with this policy.

The prevention, detection and reporting of modern slavery & human trafficking is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The employee must notify their manager, the HR Manager, or the Board of Directors as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

If the employee is unsure about whether a particular act, the treatment of employees or their working conditions within our business or any tier of our supply chains constitutes any of the various forms of modern slavery The employee must raise it with their manager or the HR Manager immediately.

If the employee believes or suspects a breach of this policy has occurred or it may occur, then they must notify their manager or report it in accordance with Nylacast's Whistle blowing Policy as soon as possible.

## TRAINING, AWARENESS AND COMMUNICATION

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 is made aware of and understand this policy and are given adequate and regular training and awareness on it.

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.

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.



## REPORTING AND MONITORING

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.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.

## REVIEW AND REVISION

The Nylacast 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.

Employees 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.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.



## CHANGE HISTORY

Date	Rev. No.	Revision by	Description of change
10/01/17	01	Ian Mallabone	First issue of the Policy
04/07/19	02	Ian Mallabone	Review with minor grammar changes
05/07/21	03	Ian Mallabone	Policy formatting updated