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- 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 is 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,
 - (c) travelling within any country.
 - (6) 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 this 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.

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.