



# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY 2021-2022

Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited are committed to working with others to take steps to eradicate modern slavery in our supply chain.

This statement details policies, procedures, and actions to reduce the risk of modern slavery and human trafficking within our supply chains and businesses. This document is published in accordance with the Modern Slavery Act 2015 and relates to the year ending December 2022.

Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited maintain relationships with many different organisations in its supply chain, as well as directly employing large numbers of people. In the light of the law on employment and human rights, and more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist and what further actions may be required to prevent slavery and human trafficking taking place in any part of our businesses or our supply chains.

The Policy below underpins our approach and should be considered in conjunction with our Statement on Slavery and Human Trafficking, republished annually. Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited have adopted a statement of our corporate value on preventing modern slavery and human trafficking. The value statement governs all business dealings and the conduct of all persons or organisations we contract directly or appoints to act on our behalf.

We expect all who have (or seek to have) a business relationship with Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited or any member of our Group to familiarise themselves with our antislavery values and to act at all times in a way which is consistent with our antislavery value.

As part of our culture of good governance for good business, at Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited, we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and associates. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is zero tolerance.

## **MONCASTER WIRE PRODUCTS LIMITED AND MONCASTER WIRE PRODUCTS LIMITED T/A BLACKWOOD WIRE PRODUCTS LIMITED ANTI-SLAVERY VALUE**

### **1.0 PURPOSE OF THIS POLICY**

The company's Policy is to comply with or exceed the statutory requirements (whether local, national or supranational) applicable to environmental matters.

- 1.1** Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

This document sets out the Policy of Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited (the "Company") to prevent opportunities for modern slavery within its businesses or supply chain. This Policy's use of the term "modern slavery" has the meaning given in the act.



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- 1.2** As a group of companies, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our businesses or suppliers.
- 1.3** For this Policy, "group" means any currently active subsidiary company of Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited, which at the date of publication includes Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited and the Policy shall specifically apply to these group companies accordingly.

## 2.0 STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 2.1** We are committed to ensuring transparency in our business and our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from our contractors, suppliers and other business partners. We are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory, or trafficked labour or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to have their suppliers to the same high standards.
- 2.2** All Associates should familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this Policy forms part of all Associates' obligations under their employment contract.
- 2.3** Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking are not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

To underpin our compliance with practical steps, we intend to implement the following measure:

- I. Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- II. Engage with our suppliers both to convey to them our Antislavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- III. Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example, as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- IV. Introduce contractual provisions for our suppliers to confirm their adherence to this Policy and accept our right to audit their activities routinely and (where practicable) relationships at times of reasonable suspicion.

## 3.0 RESPONSIBILITY FOR THE POLICY

- 3.1** The ultimate responsibility for preventing modern slavery rests with the company's leadership. The company's board of directors is responsible for ensuring that this Policy and its implementation comply with our legal and ethical obligations.
- 3.2** All senior personal are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery.



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## 4.0 ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Whistleblowing Procedure – direct access to senior leadership. The Company's Whistleblowing Procedure is intended to guide how concerns can be communicated to the company. Employees may report problems about suspected modern slavery associated with the company or our suppliers in this manner. The Whistleblowing Procedure applies to employees and may be found in the Human Resources section of the Way Manual. In summary, Associates should approach either the Managing Director, equivalent senior leaders, or the head of human resources. A company director should be approached if the matter is severe. The nature of the complaint will determine the company's next course of action.

Confidential Feedback for those who are accessing this Policy because they: -

- Are you seeking a business relationship with us/our businesses or
- Already have a business relationship with us/our businesses are also advised to familiarise themselves with the main features of our measures for combating modern slavery:

Suspicious Activity Feedback Line 01507 600666

This line may be accessed by employees or anyone wishing to raise a concern. You should call this line in any of the following circumstances: -

- You suspect a person acting on behalf of Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited or one of our businesses is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited or one of our businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited or one of our businesses or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the Suspicious Activity Confidential Feedback line ("the Line") are kept in confidence, subject to the need for Moncaster Wire Products Limited and Moncaster Wire Products Limited t/a Blackwood Wire Products Limited to act responsibly and within the law. The source of reports to the line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law or is not consistent with our maintaining our adequate procedure for the prevention of modern slavery being committed on our behalf or in any element of our supply chain

### Direct Communication

The company encourages members of the public or people not employed by us to write, in confidence, to the company secretary or the company's head of internal audit at Cavatorta House to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain



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## 5.0 SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment due to reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The company will accept and take seriously concerns communicated anonymously. However, retaining anonymity renders investigations and validation more complex and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made that are malicious or vexatious will result in disciplinary action being taken against the individual.

## 6.0 COMMUNICATION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate. We expect all with whom we have business dealings to access our policies and procedures and use them to help us prevent acts which are offences under the Modern Slavery Act 2015.

## 7.0 REVIEW

Following its initial adoption, this Antislavery and Human Trafficking policy will be regularly reviewed by the Company's Board of Directors (at least annually). It may be amended from time to time. This Policy has been used to inform our Statement on Slavery and Human Trafficking, which is republished annually.

This statement has been approved by Simon McKeon, Managing Director, for the year ending 2023.

Print Name:

S. McKeon

Signature:

A handwritten signature in black ink, appearing to read 'S. McKeon', written over a horizontal line.

Date:

13-09-22