

Modern Slavery and Human Trafficking Policy Statement

This statement sets out Pro Steel Engineering's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Pro Steel Engineering recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to:

- *preventing* slavery and human trafficking in its corporate activities;
- *ensuring* that there is no human trafficking and modern slavery within our supply chain or in any part of our business;
- *implementing* and enforcing effective systems and controls designed to address the risk of human trafficking and modern slavery.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Pro Steel Engineering has three fixed sites of operation and a fluctuating geographical range of site operations. All locations are headed by the same directors and work under the same conditions and procedures. All departments have a manager; some managers cover all sites such as HR, Health & Safety, Quality, Purchasing and Operations. The company produces a Company Organogram and a Roles and Responsibilities document as part of its Integrated Management Systems documentation.

The organisation currently operates and purchases from within the UK only, which is considered a low risk country.

The Managing Director, Operations Director and Compliance Manager will be responsible for the selection of suppliers and their compliance with this policy where necessary.

RELEVANT POLICIES

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Whistleblowing Policy;
- Corporate Social Responsibility Policy;
- Anti Bribery Policy;
- Staff Handbook.

DUE DILIGENCE

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Checking that ALL employees are eligible to work in the UK. The Company will take copies of all ID produced. It will not keep or destroy any original documents; these must be handed back to the employee, unless the Company is required by law to hold permits to work;
- Any agency worker will be checked in the same manner and will be sourced from UK labour agencies only. The Company will comply with the Agency Workers Regulations in relation to all agency workers;
- All major suppliers of products and services will be verified using the Approved Supplier Questionnaire.
 - evaluating the modern slavery and human trafficking risks of each new supplier;

- It should be considered when reviewing the responses to the questionnaire if any further steps such as auditing or monitoring need to be carried out prior to approving them as a Supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits / assessments.

AWARENESS-RAISING

The organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises which cover:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

IMPACT AND MONITORING PERFORMANCE

The organisation has completed a review in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation:

- has developed a system for supply chain verification (in place since February 2017), whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviews existing supply chains suppliers for on-going compliance.

This policy will be reviewed at least annually for its effectiveness.

A handwritten signature in black ink, appearing to read "R Selby".

Richard Selby, Director

19th January 2019