

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Policy statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

Broadwater is committed to preventing modern slavery and human trafficking in every part of its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Broadwater Mouldings Ltd provides engineering solutions in the manufacture and supply of Glass Reinforced Plastic (GRP) mouldings and assemblies. The Company was established in 1973 and use moulding techniques including: Hand Layup, Spray Layup, LPPM (Low Pressure Press Moulding), RTM (Resin Transfer Moulding), RTML (Resin Transfer Moulding-Light) and Vacuum Assisted Resin Infusion service spanning many industries worldwide

This statement covers the activities of the Company:

Business Activities: Supplying glass reinforced plastic (GRP) products to a variety of industries eg automotive and medical equipment.

Nature of Supply Chain: Our supply chain involves the sourcing of 3rd party material for the manufacture of glass reinforced plastic and resins material in the UK.

Countries of Operation and Supply: The Company currently operates in the United Kingdom and globally.

Risk Assessment and Responsibility

Broadwater Mouldings Ltd is committed to the principles of The Modern Slavery Act 2015.

We have a zero tolerance approach to modern slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. We mainly source from UK suppliers and expect these entities to have suitable anti-slavery and human trafficking policies and processes and do not source from those countries considered to be high risk as identified by the Global Slavery Index.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the United Kingdom and to safeguard employees from any abuse, coercion or exploitation. We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.

Relevant policies

Broadwater operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Anti-Slavery and Human Trafficking Policy**

This Anti-Slavery and Human Trafficking Policy sets out the minimum acceptable levels of behaviour required of all staff, as well as setting out the activities that will be undertaken to identify and address the risk of modern slavery within Broadwater and its supply chains.

- **Whistleblowing Policy**

Our Whistleblowing Policy is communicated to all employees. The intention of the policy is to outline the process for employees to report instances of corruption, malpractice, criminal behaviour and failure to deliver proper standards of service, where confidentiality is required. This policy is integral in preventing occurrences of modern slavery and human trafficking by providing an avenue whereby any suspected instance can be reported without fear of repercussions or retaliation.

The whistleblowing facility is always available to employees and any implications in terms of modern slavery can be brought to attention by any employee anytime. We encourage all workers on site to report any concerns related to the direct activities, or the supply chains of the organisation. Communication within the HR Toolkit is also available should anyone require an alternative way to report their concerns. Alternately, the Modern Slavery Helpline is also available Tel: 0800 121 700.

- **Dignity at Work Policy**

The Dignity at Work Policy covers harassment of, and by, all workers engaged to work for us: this includes employees, contractors, agency workers or anyone working in any other capacity on behalf of us. This policy provides recourse to the disciplinary procedure where an instance of harassment or other occurrence of indecent treatment of an employee occurs. Moreover, the policy sets an expectation of the obligation on employees to intervene in instances of harassment, if they feel able to do so, or at the very least report it immediately to a manager.

The Dignity at Work policy has the effect of reducing, or curtailing, any forms of inhuman or degrading treatment in the workplace, not only by those employed by us but also any person onsite and is therefore also compliant with Articles 3 and 4 of the European Convention on Human Rights.

- **Anti-Bribery Policy**

The Company makes it clear to relevant employees the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Due Diligence

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Awareness-raising programme

The Company raises awareness of modern slavery issues by conducting an appropriate awareness campaign which explains to staff:

- The basic principles of the Modern Slavery Act 2015;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- What external help is available, for example through the Modern Slavery Helpline

Director Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our current Anti-Slavery and Human Trafficking statement. It has been approved by the Company's Directors who review and update it as necessary.