

Subject	Anti-Slavery and Human Trafficking Policy
Issued By	HR Department
Applies To	Xtratherm UK
Issued	16 th March 2018

1. PURPOSE OF THIS POLICY

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 in order to exploit them for personal or commercial gain. This document sets out the policy of Xtratherm (the “Group”) with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.

1.2. As a Group, 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 own businesses or those of our suppliers.

2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 We are committed to ensuring there is transparency in our own business and in 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 all of our contractors, suppliers and other business partners, and 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 require our suppliers to hold their own suppliers to the same high standards, set out in our “Supplier Code of Conduct” policy.

2.2 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is 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:

a) 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;

b) Engage with our suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not

occurring in their businesses and their supply chain

c) Introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;

d) Introduce Xtratherm “Supplier Code of Conduct “to our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

e) Corruption/Ethics training is done at least once every two years across the Company. Employees are trained, based on the nature of their job responsibilities, to understand the potential for corruption to occur. We utilize web-based anti-corruption training , in order to help them better understand corruption policies and procedures. In addition, these individuals complete an ethics/corruption survey annually.

3. RESPONSIBILITY FOR THE POLICY

3.1 Ultimate responsibility for the prevention of modern slavery rests with the Group’s leadership. The Board of Directors of Xtratherm has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Managers at all levels are responsible for ensuring those reporting to them:

a) understand and comply with this policy; and

b) are given adequate and regular training on it and the issue of modern slavery.

4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

4.1 Internal

Employees are encouraged to raise any concerns about suspected modern slavery associated with the Group or our suppliers and should do this either through their line manager or by HR.

4.2 External

Members of the public or people not employed by the Group to write, in confidence, to the HR Department (either via e-mail: hr@xtratherm.com or to the registered office) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

4.3 We aim to encourage openness and will 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 of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable

treatment connected with raising a concern.

4.4 The Group will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged without prejudice to put their names to allegations.

5. BREACHES OF THIS POLICY

5.1 If an issue is identified with a supplier we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.

5.2 We reserve the right terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

6. COMMUNICATION AND AWARENESS OF THIS POLICY

6.1 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 thereafter.

7. REVIEW

7.1 Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This Policy will be used to inform our Statement on Slavery and Human Trafficking which will be published annually.

Signed: _____



Amy Rafferty
Managing Director

Date: 16/03/2018