

Press Metal UK Ltd
Modern Slavery and Human Trafficking Statement

For the financial year 2017-2018

Introduction

The statement sets down Press Metal UK Ltd's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Structure and Supply Chains

This statement covers the business activities of Press Metal Ltd which are as follows:

- The wholly owned UK subsidiary of Press Metal Berhad, Malaysia who act as the sales, marketing and distribution arms of Press Metal International Ltd and Press Metal International Technology of Foshan City, China.
- We import, store and distribute aluminum within the UK and Ireland.

The Company currently operates in China, Malaysia, United Kingdom, Ireland.

High Risk Activities

We are aware that some of the services we carry out have a higher risk of modern slavery due to their location. Although we comply with all government laws in relation to wages and our operation is well established we acknowledge that last year, we could have developed our communications and assessments.

We intend to utilize our knowledge of our business and supply chain this year to assess engagement of labour providers, sub-contractors to develop ways of discussing and understanding the impact further down the chain. This will be an on-going process.

Last year we carried our risk assessments in respect of human rights and modern slavery by reviewing passports and driving licenses. We always met the government set wage level in each country and responsibility lay with Andrew Clarke.

Andy Brace is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains and improving our assessment over the next year. This Statement affirms our intention to act ethically in our business relationships.

The policies in schedule 1 set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- i) **Modern Slavery Statement**
- ii) **Whistleblowing Policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- iii) **Disciplinary Policy** - the Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.

Due Diligence Processes for Slavery and Human Trafficking

The Company will now undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence process will include reviewing our supply chain as far as possible but more importantly, building long-standing relationships with suppliers and making clear our expectations of business partners.

We may also from time to time and where necessary issue action plans to suppliers where we identify areas of improvement.

When necessary we will invoke sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance Indicators

This Modern Slavery and Human Trafficking Statement will be reviewed each year and updated as necessary. Andy Brace and the entire management team endorse this policy statement and are fully committed to its implementation.


Training

We recognize the need to develop training for colleagues within the business in relation to assessment of our business generally and our supply chain. It is important that each of our colleagues understands what Modern Slavery is and how they can escalate concerns.

This Modern Slavery and Human Trafficking Statement has been approved and authorized by:

Name: Andy Brace
Position: Operations Director
Date: April 2019

Signature:



15/04/2019

Schedule 1

Modern Slavery Policy

(extracted from employee handbook)

Our culture is to be open, honest and straightforward with our customers, suppliers, partners and each other. We do not tolerate any form of Modern Slavery.

Our minimum standard are to:

- a) Ensure that workers are not being exploited, that they are safe and that relevant employment laws (including in relation to wages and working time), health and safety laws, human rights laws and international standards are adhered to, including freedom of movement and communications;
- b) Seek line manager advice if you are concerned that an instance of Modern Slavery might have occurred,
- c) Report breaches of this Policy, which can be done in confidence and in accordance with our whistleblowing policy.

As well as the prevention of exploitation of workers, please be informed that modern slavery includes:

- Human Trafficking;
- Forced labour to pay off a debt;
- Children working in conditions which are harmful to them;
- Forced domestic labour;

If employees spot any concerns, they must be raised.

If suppliers or partners fail to comply with this Policy, we are likely to end our relationship.

Whistle-blowing Policy **(extracted from employee handbook)**

Under certain circumstances, employees have legal protection if they make disclosures about the company for whom they work. These employees are commonly referred to as “whistle blowers” and their activities have often received wide publicity in the media. Legislation is in place to protect employees from suffering any detriment for whistle blowing.

Qualifying Disclosures

Certain disclosures are prescribed by law as qualifying disclosures. Disclosures are qualifying disclosures where it can be shown that the company has committed, is committing or will commit a relevant failure by:-

- a. committing a criminal offence.
- b. failing to comply with a legal obligation.
- c. being involved in a miscarriage of justice.
- d. endangering the health and safety of an individual.
- e. Damaging the environment.
- f. concealing any information relating to the above.

The Procedure

If you wish you should in the first instance report any concerns you may have to the Company who will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate organisation or body, e.g. the Police, the Environment Agency, Health and Safety Executive or Social Services Department. If you do not report your concerns to the Company you may take them directly to the appropriate organisation or body.

We encourage you to use this procedure if you are concerned about any wrong doing at work. However, if the procedure has been invoked in bad faith for example, for malicious reasons or in pursuit of a personal grudge, then it will make you liable to immediate termination of your employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

Disciplinary Policy **(extracted from employee handbook)**

It is necessary to have a minimum number of rules in the interests of the whole organisation. The rules set standards of performance and behaviour whilst the procedures are designed to help promote fairness and order in the treatment of individuals it is our aim that the rules and procedures should emphasise and encourage, improvement in the conduct of individuals where they are failing to meet the required standards and not be seen as punishment.

Every effort will be made to ensure that any action taken under this procedure is fair, with you being given the opportunity to state your case and appeal against any decision that you consider to be unjust. The following rules and procedures should ensure that:-

- a. the correct procedure is used when inviting you to a disciplinary hearing
- b. you are fully aware of the standards of performance, action and behaviour required
- c. disciplinary action is taken speedily and in a fair, uniform and consistent manner
- d. you will only be disciplined after careful investigation of the facts. On some occasions temporary suspension on full pay may be necessary in order that an uninterrupted investigation can take place. This must not be regarded as disciplinary action or a penalty of any kind
- e. other than for an "off the record" informal reprimand, you have the right to be accompanied by a colleague or trade union official, who may act as a witness or speak on your behalf at all stages of the formal disciplinary process
- f. you will not normally be dismissed for a first breach of discipline, except in the case of gross misconduct
- g. if you are disciplined you will receive an explanation of the penalty imposed and you will have the right to appeal against the finding and the penalty.

Disciplinary Rules

It is not practicable to specify all disciplinary rules or offences which may result in disciplinary action, as they may vary depending on the nature of the work. In addition to the specific examples of unsatisfactory conduct, misconduct and gross misconduct shown in this handbook, a breach of other conditions, procedures, rules etc. within this handbook will also result in the disciplinary procedure being used to deal with such matters.

You will be liable to disciplinary action if you are found to have acted in any of the following ways (this list is not an exhaustive list):-

- a. failure to abide by the general health and safety rules and procedures

- b. smoking in designated non smoking areas
- c. consumption of alcohol on the premises
- d. persistent absenteeism and/or lateness
- e. unsatisfactory standards or output of work
- f. rudeness towards customers, members of the public or other employees, objectionable or insulting behaviour, harassment, bullying or bad language
- g. failure to devote the whole of your time, attention and abilities to our business and its affairs during your normal working hours
- h. unauthorised use of E-mail and Internet
- i. failure to carry out all reasonable instructions or follow our rules and procedures
- j. unauthorised use or negligent damage to or loss of our property
- k. failure to report immediately any damage to property or premises caused by you.

Serious Misconduct

Where one of the unsatisfactory conduct or misconduct rules has been broken and if upon investigation, it is shown to be due to your extreme carelessness or has a serious or substantial effect upon our operation or reputation, you may be issued with a Final Written Warning in the first instance.

You may receive a Final Written Warning as the first course of action, if, in an alleged gross misconduct disciplinary matter, upon investigation, there is shown to be some level of mitigation resulting in it being treated as an offence just short of dismissal.

Gross Misconduct

You will be liable to summary dismissal if you are found to have acted in any of the following ways (this is not an exhaustive list):-

- a. grossly indecent or immoral behaviour, deliberate acts of unlawful discrimination or serious acts of harassment
- b. dangerous behaviour, fighting or physical assault
- c. incapacity at work or poor performance caused by intoxicants or drugs.
- d. possession, supply or use of illicit drugs
- e. deliberate falsification of any records (including time sheets, absence records and so on, in respect of yourself or any fellow employee)
- f. undertaking private work on the premises and/or in working hours without express permission

- g. working in competition with us
- h. taking part in activities which result in adverse publicity to ourselves, or which cause us to lose faith in your integrity
- i. theft or unauthorised possession of money or property, whether belonging to us, another employee, or a third party
- j. destruction/sabotage of our property, or any property on the premises
- k. serious breaches of the health and safety rules which endanger the lives of employees, or any other person
- l. gross insubordination and/or continuing refusal to carry out legitimate instructions
- m. breach of the personal harassment policy
- n. breach of the protected disclosure policy
- o. breach of the Modern Slavery policy
- p. interference with or misuse of any equipment for use at work that may cause harm.

Disciplinary Authority

The operation of the disciplinary procedure contained in the previous section, will be completed by an appropriate member of the senior management team. Any appeal against a decision must be directed at the Directors of the Company and will be dealt with by an alternative senior manager, a Director or where necessary an external consultancy.

Period of Warnings

The length of time that each type of warning shall remain valid for shall vary and shall be decided on a case by case basis. The employee should be informed in writing how long the warning shall remain valid for.

General Notes

If you are in a supervisory or managerial position then demotion to a lower status at the appropriate rate of pay may be considered as a disciplinary sanction. In exceptional circumstances, suspension from work without pay for up to five days may also be used as a disciplinary sanction.

Gross misconduct offences may result in dismissal without notice.