



ERIEZ MAGNETICS EUROPE LIMITED

Anti-Slavery & Human Trafficking Policy

1. Introduction

- 1.1** 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.
- 1.2** 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.

2. Policy Statement

- 2.1** We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
- 2.1.1** We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- 2.1.2** We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.



- 2.1.3** We are committed to engaging with our direct suppliers where possible to address the risk of modern slavery in our operations and supply chain.
- 2.1.4** As part of our contracting processes, where we are able to negotiate the terms of supply we negotiate to include a specific prohibition against the use of modern slavery and trafficked labour and an ability to audit the supplier's organisation for compliance with this policy.
- 2.1.5** Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with this policy. We ensure that we do not employ people who are underage or who do not have the right to work in the UK.

3. Policy Application

- 3.1** This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, suppliers, external consultants, third-party representatives and business partners.
- 3.2** This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 3.3** Workers must ensure that they read, understand and comply with this policy.

4. Responsibility for the policy

- 4.1** The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations
- 4.2** The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 4.3** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 4.4** Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.
- 4.5** The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them



5. Reporting Modern Slavery

- 5.1** Employees must notify their line manager as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy.
- 5.2** If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible the Operations Director.
- 5.3** 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. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

6. Breaches of this policy

- 6.1** Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2** The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

This policy has been approved & authorised by:

Name:	John Curwen
Position:	Managing Director
Date:	25 th March 2019
Signature:	