



Rely on it.

RENOLIT Cramlington Ltd

Anti – Slavery Policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for, or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third party representative.

We expect all who have, or seek to have a business relationship with the Company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

Modern Slavery

Modern slavery can take many forms. The MSA covers four key criminal activities:

Slavery: where ownership is exercised over an individual

Servitude: involves the obligation to provide service imposed by coercion

Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.

Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Another form of modern slavery, which we will not tolerate, but is not specifically referenced in the MSA is **Child Labour**. While not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health and physical wellbeing.

Procedures

To underpin its responsibilities, the Company has implemented the following:

- We have conducted risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery.
- Where appropriate, as informed by our risk assessment, we will engage directly with suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains.

- Our contractual documentation will incorporate specific prohibition against slavery, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy. We will also make provision for our contracted suppliers to hold their own suppliers to the same standards

Responsibility for this policy

The Board of Management has overall responsibility for this policy and in ensuring that RENOLIT Cramlington Ltd complies with all its legal obligations.

The Purchasing Manager will have the primary day-to-day responsibility for the implementation of this policy within our supply chain, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All senior managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and employee awareness training

The HR Director will ensure that all employees receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's Code of Conduct training, a part of the induction process.

In addition employees will, as appropriate, receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identifying of areas of the business that may be at risk from practices of modern slavery.

Breaches of this policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

A breach of this policy by an employee, director or officer of the Company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Purchasing Manager.

Status of this policy

This Anti-slavery policy will be reviewed by the Company's board of directors on an annual basis.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

Signed: 
Dave Hall
Chief Executive Officer, RENOLIT Cramlington Ltd.

Date: 2.1.18