

Modern slavery and human trafficking policy

V3 January 2023

Modern slavery statement

Organisation

This statement applies to Advanced coldformed sections Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 1st April 2023 to 31st March 2024.

Organisational structure

This statement covers the activities of Advanced coldformed sections Ltd;

• Advanced coldformed sections Ltd is an innovative company in light steel framing technology, manufacturing and fabricating steel within commercial, residential and retail accommodation. Metek plc currently only operates within the UK.

The following is the process by which the company assesses whether particular activities or countries are high risk in relation to slavery or human trafficking;

• Risk assessments are carried out annually with CIS checks on all sub-contractors. Identity checks are carried out on all new members of staff and annually thereafter if required.

The following activities are considered to be at high risk of slavery or human trafficking:

• The company does not have any high-risk activities due to the ongoing CIS and identity checks completed.

The labour supplied to the Organisation in pursuance of its operation is carried out in [insert locations where work is carried out e.g. if your organisation sends employees to other countries to carry out work, include those countries. If work is wholly carried out in the United Kingdom, state that fact, together with the applicable regions.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation the UK.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to our supply chain. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Potential exposure

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures are in place to identify and assess the potential risks in our supply chains
- a zero tolerance policy towards modern slavery
- training provided to staff on modern slavery, relevant to their roles within the business.

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- CIS and identity checks carried out on all new employees and subcontractors.
- Training for staff.

Policies

The Organisation has the Modern Slavery policies which further define its stance on modern slavery.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed: LStrut

Print name: Lottie Stuart Job Title: Director Date: 10.01.23