

EUROPEAN SPRINGS AND PRESSINGS LTD MODERN SLAVERY STATEMENT 2017

Introduction

Modern Slavery is a global issue in both industrialised and developing nations. We accept that the Modern Slavery Act was enacted to; fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. Modern Slavery can be defined as; slavery, servitude and forced or compulsory labour. The Act also prohibits Human Trafficking and any act which deprives a person of their liberty, or exploits them for personal or commercial gain.

European Springs and Pressings Ltd has a zero tolerance to Modern Slavery within our own operations and expect our suppliers to take the same view.

Business and Supply

European Springs and Pressings Ltd is the UK's leading manufacturer of Springs and High Speed Pressings, selling our products both in the UK and internationally. Our Corporate Responsibility Policies outline our commitment to; sourcing responsibly, reducing waste, helping our local communities, ethical business practices, and environmental responsibility. Our product supply chains are both UK and global.

Policies and controls

European Springs and Pressings Ltd Corporate Responsibility policy includes our Modern Slavery Act Policy which confirms that we are committed to the principles of the Act;

- We do not permit or condone; illegal or forced labour, in our workplaces or in our supply chains.
- We do not permit and are not complicit in child labour, in our workplaces or our supply chains. All of our employees are over the compulsory school leaving age. Those employees considered to be 'Young Workers' are employed in strict accordance with the Working Time Regulations Act 1998.
- We complete 'due diligence' with regards to our suppliers and business partners to ensure they do not permit, condone or are complicit in; illegal or forced labour
- We request that our suppliers to complete 'due diligence' with their own supply chain.

We do not condone abuse of human rights and investigate any allegations that human rights are being abused, either internally or in our supply chains.

All suppliers are required to confirm that they have completed 'due diligence' and require them to;

- Undergo supplier audits
- Confirm that employees are; given good working conditions, are treated in a fair manner, given rates of pay which are in accordance with national minimums;
- Comply fully with national and international laws regarding workers' rights.

We also require confirmation that:

- All workers are voluntarily in employment, and not under threat of penalties or sanctions
- Employers do not keep original copies of identity documents.
- Workers are free to leave work at any time and indentured labour is prohibited.

Steps taken to prevent modern slavery and human trafficking business and supply chains.

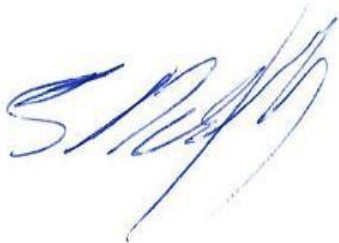
During 2017, European Springs and Pressings Ltd included in its standard supplier terms confirmation that suppliers will; comply with the Modern Slavery Act, conduct regular Modern Slavery 'due diligence' within their own supply chains, implement controls to prevent Modern Slavery, and notify European Springs and Pressings Ltd if they become aware of any breaches within their supply chains. Suppliers which breach these obligations will face appropriate actions which could include termination of contracts.

We are aware that some of our international suppliers may not operate with the same ethical standards that we expect. We are also aware that some of the materials supplied may fall under the auspices of 'Conflict Minerals'. In accordance with advice from the UK Government Department for International Development (DfID) and in accordance with the UN Guiding Principles on Business and Human Rights; we require all of our suppliers dealing in such materials to declare that these are not 'conflict minerals', and have been produced/mined/sourced in an ethical manner. By doing so, we also comply with the US 'Dodd-Frank Act' and the UK Bribery Act.

Summary

European Springs and Pressings Ltd are committed to the principles of the Modern Slavery Act and are taking appropriate steps to ensure that we, and our suppliers, are compliant with the Act. We will continue to monitor our own behaviours, and that of our suppliers to ensure that we do not become complicit with forced, indentured or illegal labour.

We take our Corporate Responsibilities seriously and will investigate, report and; where appropriate, take punitive action against those who fail to maintain the Ethical Standards that we have set.



Stuart McSheehy
Managing Director
European Springs and Pressings Ltd



Howard Downs
Technical Director
European Springs and Pressings Ltd