



The Bri-Stor Group consists of Bri-Stor Systems Ltd, Alpha Manufacturing Hixon Ltd and Atlas Coating Ltd. For the purposes of this policy the business will be referred to as "The Bri-Stor Group".

The Bri-Stor Group maintains relationships with many different organisations in its supply chain, as well as employing directly large numbers of people. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have implemented a document policy to help prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

The Bri-Stor Group has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all those who have, or seek to have, a business relationship with The Bri-Stor Group, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery value.

## **ANTI-SLAVERY VALUES**

As part of our culture of good governance for good business, at The Bri-Stor Group we operate to a set of core values which reflects our relationships with our board of Directors, customers, manufacturers, suppliers and team members. We adopt a behavioural value for all of our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all of its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to modern slavery is: zero tolerance.

### **1. PURPOSE OF THIS POLICY**

1.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Bri-Stor Systems Ltd (the "Company") with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

1.2 We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.







## 2. STEPS FOR THE PREVENTION OF MODERN SLAVERY

2.1 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors and suppliers. We expect our suppliers to hold their own suppliers to the same high standards.

2.2 Our Management team have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for any incidence of modern slavery is prevented.

2.3 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

## 3. RESPONSIBILITY FOR THE POLICY

3.1 Ultimate responsibility for the prevention of modern slavery rests with the Company's Management Team. The board of Directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

3.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

## 4. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

The Company's Grievance Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner.

If any employee, supplier, customer or member of the public suspect that the Modern Slavery Act 2015 has been breached they should in the first instance contact either in person, at the company's headquarters, via email, fax or by telephone to the Human Resources Manager. If the matter is extremely serious then the Managing Director of the Company should be approached. The nature of the complaint will determine the Company's next course of action.

## 5. SAFEGUARDS

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. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

## **6. COMMUNICATION AND AWARENESS OF THIS POLICY**

Our zero-tolerance approach to modern slavery must be communicated to all suppliers and contractors at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **7. REVIEW**

Following its initial adoption, this Policy will be reviewed annually by the Company's Board of Directors and may be amended as required.

A P Humphrey  
Group Managing Director  
1<sup>st</sup> June 2018

