



UK MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to ACS Stainless Steel Fixings Limited (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2019-2020.

B) ORGANISATIONAL STRUCTURE

ACS is a leading manufacturer and designer of structural building components such as wall ties, windposts, masonry support and brick slip systems – all essential components used for the construction of modern-day structures, large or small.

Our Head Office function is based in Leeds, with other regional offices across the country. The labour supplied to the Organisation in pursuance of its operation is carried out in the United Kingdom only. Set out below are the steps that the organisation takes to mitigate risk in these areas.

C) 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 or 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.

D) 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 in the United Kingdom.

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to the supply of multi-metal materials and other products/goods from various suppliers in both the United Kingdom and China. To our knowledge, each supplier upholds their own standards of anti-slavery and anti-human trafficking compliance.



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F) POTENTIAL EXPOSURE

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

G) 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:

- No steps have been taken

H) 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 by maintaining an approved supplier list with contact details and ensuring appropriate action is taken if there were any reports of modern slavery in its supply chains or if any complaints were made through the Organisations whistleblowing policy.

Suppliers and Subcontractors are approved on the basis that they are able to supply products/services or materials that conform to applicable specifications and, where appropriate, they have established a satisfactory history of supply. Suppliers of critical materials/equipment or Subcontractors of critical services may be sent a Supplier/Subcontractor Questionnaire.

Approved Suppliers and Subcontractors details are retained on the Company's ERP System and in addition further information obtained from the returned Supplier Questionnaires is also recorded. The approval status of suppliers and subcontractors is monitored continuously and audited twice a year.

I) POLICIES

The Organisation has a Corporate Responsibility Policy which defines its stance on modern slavery. The Organisation also has a Whistleblowing Policy in place which encourages the reporting of any wrongdoing which is in the public interest.

J) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery. All employees are made aware of the Organisations policies relating to the standard of behaviour required from them.



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K) 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 obligations in this regard.

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

Date of approval: 15.11.19

Managing Director - David Flannery

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