Modern Slavery and Human Trafficking Statement

U.K. Handrails Ltd is committed to ensuring that its organisational structure, businesses and supply chain are undertaking their tasks in compliance with relevant legislations, regulations and local laws to tackle the Modern Slavery and Human Trafficking problem.

U.K. Handrails Ltd is pledged to regularly evaluate the impact of our activities, products and services. We will continually promote workers protections, access to broader civil rights and community development.

It is our policy to:

- Be committed to high ethical standards in the conduct of our business and supply chain.
- Promote Fair Trade, Sustainability and Human Rights in our Tendering, Procurement and Recruitment process.
- Operate a robust Recruitment Policy, including 'eligibility to work in the UK checks' for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Operate a Whistleblowing Policy to make sure employees know that they can bring their concerns about how colleagues are being treated and how practices within our business or supply chain are being undertaken, without fear of reprisals.
- Stand for our Code of Conduct explaining the way we behave as an organisation and how we expect our employees and suppliers to act.

We will define Modern Slavery and Human Trafficking objectives, targets and improvement actions that are related to this statement. We will regularly evaluate progress and keep it available on our website or make it available on demand.

We are committed to provide relevant Modern Slavery and Human Trafficking training.U.K. Handrails Ltd will promote the awareness of the problem to employees and, where appropriate, to suppliers. We will communicate our performance in tackling the Modern Slavery and Human Trafficking within the organisation and to the public.

We will implement processes to prevent Modern Slavery and Human Trafficking to ensure that we are prepared to deal with potential emergencies.

This statement will be regularly reviewed and updated to take account of organisational priorities and changes, legislation and best practice.

U.K. Handrails Ltd Responsibilities

Based on the four-step management method *Plan- Do- Check- Act* the U.K. Handrails Ltd will:

- Develop a Modern Slavery and Human Trafficking Statement.
- Take steps applicable to the size and undertakings of the company to identify and address any potential modern slavery risks as well as regularly review actions put in place to mitigate the risk.
- Provide information and relevant training on Modern Slavery and Human trafficking to all employees, contractors and supply chain.
- Confirm the organisation's compliance against the company statement and set performance objectives seeking continuous improvement.
- Ensure the Supply Chain/ Sub-Contractor compliance against the standards set in the company Modern Slavery Statement.
- Regularly review the company Modern Slavery and Human Trafficking management system.

Employee Responsibilities

- To act and work within the company guidelines and policies relating to Modern Slavery and Human Trafficking including the Whistleblowing Policy.
- To partake in the Modern Slavery and Human Trafficking training, activities and campaigns provided by the Company.
- To report any modern slavery and human trafficking activities within the company and Supply Chain to the senior managers.

Arrangements

The following arrangements explain how the company will fulfil their Modern Slavery and Human Trafficking management procedures and legal responsibilities.

Organisation's Policies in relation to slavery and human trafficking:

- U.K. Handrails Ltd has adopted policies to help identify modern slavery risks and actions to be taken to eliminate and prevent slavery and human trafficking in our businesses undertakings.

Due diligence processes in relation to slavery and human trafficking:

- While reviewing the existing suppliers and assessing the new ones, we will conduct due diligence by:
  - Careful mapping of the supply chain product;
  - Conducting supplier audits or assessments with focus on slavery and human trafficking;
  - Creating a risk profile for each supplier;
  - Educating the suppliers on the improvement of substandard practices by providing advice and recommending action plans.
  - Participating, as far as reasonably practicable, in collaborative initiatives organised to educate organisations and exchange information on most recent practices established to identify and tackle the slavery problem.

Risk assessment and management:

- We, U.K. Handrails Ltd will assess and manage, as far as reasonably practicable, the risks associated with modern slavery and human trafficking within our businesses and supply chain.
- Prior to the risk assessment we will map the supply chain to be able to understand the issues related to logistics, human processes and country of origin of goods, supplies and services used by our organisation.
- Through the conducted assessment we will be able to pinpoint the risks, assess their level of importance and reinforce appropriate control measures.

Effective action taken to address modern slavery, monitoring, auditing through Key Performance Indicators (KPI's):

- The overview of the yearly performance summary against the modern slavery and human trafficking objectives will be available to the public through the company website as part of policies the transparency demand.
- *OR if the company does not have their own website:*
- The overview of the yearly performance summary against the modern slavery and human trafficking objectives will be available to the public on a written request as part of the transparency demand.

Training on modern slavery and human trafficking:

- U.K. Handrails Ltd will provide all necessary information, instruction and training for their employees and contractors to ensure the workforce has enough skills

and understanding of the modern slavery and human trafficking problem to notice it, know how to report it and have sufficient knowledge to avoid it, especially in procurement, human resources and supply chain management.

- The Modern Slavery and Human Trafficking training will be proportionate to the size of the company and relevant to company undertakings.
- The training will be delivered through:
    - Acknowledgement of company Modern Slavery statement
    - Toolbox talks
    - Appropriate online training
- Senior Management and the at-risk managers, supervisors and employees will attend relevant seminars, workshops and courses on Modern Slavery and Human Trafficking to gain the latest and most updated knowledge.
- The training progress will be included within the company key performance indicators and individuals' yearly objectives.

Signed: Signed Digitally via SMAS Portal
Date: 10/5/2022 12:00:00 AM | Full Name: Stephen Stockwell | Position: