

# Modern Slavery and Human Trafficking

## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the approach taken by Doncasters Limited and its subsidiaries (“Doncasters” or “the company”) to understand the potential modern slavery risks related to its business and its wider group,

Doncasters is committed to ensuring that all of their business dealings are carried out in full compliance with relevant laws and in doing so, endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

Doncasters is committed to improving its practices to combat slavery and human trafficking and has taken significant steps to promote and improve its ongoing commitment to eliminating abuse and exploitation in the workplace as detailed in this statement.

## Our organisation

Doncasters is a leading international manufacturer of high-precision alloy components. Our manufacturing facilities are located in Europe, USA, India, Mexico and China but we both source materials and sell into markets across the globe. As a result, we take a global approach to dealing with modern slavery and child labour.

## Our principles

Modern slavery is a crime and a breach of fundamental human rights. We believe that everyone, everywhere has the right to live their life free from slavery and abuse.

Our company is built on clear values of mutual respect and equality.

We have zero tolerance for exploitation of any kind and understand that it comes in many forms, including human trafficking, forced labour, debt bondage/bonded labour, descent-based slavery, and child labour.

We recognise that slavery has been linked to certain raw materials commonly used in our industry, such as nickel and cobalt mining. We are working hard to ensure that materials linked to exploitation do not enter our supply chain.

### **Our policies**

We have implemented the following policies, procedures and agreements which form part of our approach to mitigate against the risk of modern slavery within our own companies or our supply chain:

- Code of Conduct
- Procurement Policy
- Speak Up Policy and Hotline
- Diversity and Inclusion Policy
- Anti-Harassment Policy
- Grievance Policy and Procedure

### **Our ethical code**

Our Code of Conduct, which reflects a wider scope than simply ethics, is available as a booklet (using recycled paper) and on our website. We ask all suppliers to adhere to it or to principles that are no less strenuous in our contracts.

### **Enhanced Due Diligence**

When we sign up long term contractual partners, we ask them to complete new questionnaires which include questions around the minimum age of their workers, adherence to labour laws, adoption of living wages (where applicable) and adherence to modern slavery legislation or its equivalent. Where necessary we supplement questionnaires with third-party checks using risk intelligence data.

### **Contracts**

We inform our suppliers and contractors that we have a zero-tolerance approach to the practice of modern slavery, child labour, trafficked, bonded or compulsory labour in any forms.

Our standard supplier contracts include the right to terminate in the event that we find, or have reasonable grounds to suspect, that any form of forced or involuntary labour, including but not limited to modern slavery, is being used.

Where our negotiation position does not enable us to use our contractual terms, we always look for similar clauses in the supplier's terms and conditions or we ask for them to be included.

Our procurement teams have been asked to highlight where they are unable to get suppliers to agree to such terms prior to signing agreements and we seek either alternative suppliers or ways to reassure ourselves that such companies are acting ethically.

### **Awareness and training**

Raising awareness and training is a key focus for us. Our employees are trained to recognise and report any suspicions they have on modern slavery.

We ensure that as part of the onboarding process all staff are made aware of our Code of Conduct, the Anti-Modern Slavery Statement and supporting policies.

### **Effective monitoring**

We monitor the effectiveness of this Policy Statement within our supply chain as we work towards ensuring we have complied fully with:

- all new suppliers completing a procurement questionnaire
- all applicable new contracts having contractual provisions relating to the prevention of modern slavery
- ongoing training to raise awareness of modern slavery and Doncasters' zero tolerance to it for existing and new suppliers

**This statement applies to all companies in the Doncasters Group.**

## Review and responsibility

The Doncasters Board of Directors has overall responsibility for ensuring that this statement complies with our legal and ethical obligations and that it is reviewed on an annual basis.

The Executive is responsible for raising awareness and implementing the policies supporting this statement.

The devolved procurement teams and the Internal Audit function have responsibility for implementing this policy statement and monitoring its effectiveness at individual company level.