Modern Slavery Act 2015: SMP's Voluntary slavery and human-trafficking statement

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

We expect all who have or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy.

Aims of this policy

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

What do we mean by modern slavery?
Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:
Slavery: where ownership is exercised over an individual
Servitude: involves the obligation to provide service imposed by coercion
Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.
All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.
Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

How do we seek to embed our anti-slavery policy in practice?

To underpin our policy commitments, we are implementing the following measures over the course of the financial year 2023/2024:
Where appropriate, as informed by our risk assessments, we will undertake pre-screening of prospective suppliers as part of our tender processes in relation to the effectiveness of their existing safeguarding controls and practices including, but not limited to those in relation to preventing modern slavery occurring within their organisation and within their own first tier supply chain.

Our contractual documentation will incorporate specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy. We also make provision for our contracted suppliers to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.

Responsibility of this policy

The board of directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.
The HSE manager will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.
All line mangers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

Communication and employee awareness training

The HSE manager will ensure that relevant staff receive adequate training on this policy and any supporting processes applicable to their role.
In addition, staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and the identify individuals/areas of the business that may be at risk from practices of modern slavery.

Breaches of this policy

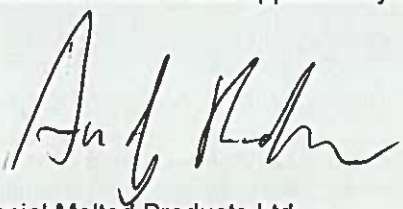
Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.
Everybody to who whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.
If any part of this policy is unclear, clarification should be sought from the HSE manager.

Status of this policy

This Anti-slavery policy will be reviewed by the Company's board of directors on an annual basis.
This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

This voluntary slavery and human trafficking statement is made for the financial year ending December 2023. It was approved by the Managing Director, K A Richardson, on 29/08/2024.



Special Melted Products Ltd

Date: 29/08/24.