

MODERN SLAVERY POLICY



RW Armstrong is committed to understanding modern slavery risks; and ensuring that there is no modern slavery within our own business or supply chains.

Modern slavery is 'a hidden crime that encompasses slavery, servitude, forced labour and human trafficking'. Modern slavery has no place in our business or supply chains and we take a zero-tolerance approach to it.

Hidden labour exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work finding services and work-related exploitation such as forced use of accommodation. It is understood that it is often well hidden by the perpetrators; with victims, if they perceive themselves as such, reluctant to come forward.

Our employees are made aware of the risks of slavery and human trafficking and are expected to report any concerns. Management will be expected to act upon them.

OUR SUPPLY CHAIN

We are committed to ensuring that there is no slavery or human trafficking in our supply chains and it is our policy to implement effective and robust controls to ensure this is not taking place. We are in the process of introducing supplier questionnaires to ensure that all of our products are responsibly sourced.

OUR POLICIES & APPENDICES IN RELATION TO MODERN SLAVERY & HUMAN TRAFFICKING

RW Armstrong & Sons Ltd will not knowingly use any individual or organisation to source and supply workers using practices of forced labour or human trafficking for labour exploitation. We will report any evidence or suspicion of cases or hidden third party labour exploitation to the Gangmasters and Labour Abuse Authority immediately.

Failure by managers and leaders of the company, third party labour providers or organisations in the labour supply chain to act upon concerns of worker maltreatment, coercion or harassment will be regarded as potential gross misconduct and will be managed accordingly through the relevant disciplinary process.

Whistleblowing Policy – RW Armstrong actively encourages all its employees to report any concerns that raise suspicions related to human trafficking both inside our organisation and through the supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. RW Armstrong's procedure is designed to make it easy for workers to make disclosures without fear of retaliation.

Recruitment – RW Armstrong & Sons Ltd will not use any individual or organisation to source and supply workers using practices of forced labour, human trafficking for labour exploitation, payment for work finding services or any work-related exploitation such as forced use of accommodation. RW Armstrong & Sons Ltd will confirm (through their own recruiting processes or through recruiting processes of third-party agencies) that workers are not subject to any of the above practices and will report any evidence or suspicion of cases of hidden third-party labour exploitation to the Gangmasters and Labour Abuse Authority immediately.

Agency Workers – RW Armstrong & Sons Ltd only uses specified reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Regular audits of each agency as well as audits of new agencies beginning to supply RW Armstrong & Sons Ltd are part of the processes by which risks of slavery and human trafficking are addressed in relation to agency workers. All agencies used for temporary labour in the manufacturing of our products are licensed by the Gangmasters and Labour Abuse Authority. We actively check these and audit them on a regular basis.

Training – RW Armstrong & Sons Ltd provides information on "Hidden Labour Exploitation" to our workforce through a variety of formats including staff presentations during induction and training periods

and through internal auditing processes. The company also actively encourages workers to report cases of hidden third party labour exploitation, provides the means to do so and investigates and acts upon reports appropriately.

Business Integrity – RW Armstrong & Sons Ltd clearly communicates to employees the actions and behaviours expected of them when representing the organisation. The organisation strives to maintain the highest standard of employee conduct and ethical behaviour when managing its supply chain.

DUE DILIGENCE

We are in the process of undertaking due diligence when considering taking on new suppliers and we will regularly review our existing suppliers and ethical standard across the business. We will never knowingly accept products from suppliers who exploit the people or natural resources within their environment.

CONTINUOUS MONITORING

RW Armstrong & Sons Ltd takes a zero-tolerance approach to slavery and we are committed to ensuring that operations and supply chains are free from slavery or human trafficking. Every employee will be familiar with our Ethical standards and policies & appendices to ensure no slavery occurs within the business and are encouraged to report any potential breaches. Our statement is visible for all staff to view on the company's website, intranet and from the HR department, as well as being provided during induction.

STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved by the directors of RW Armstrong & Sons Ltd and will be reviewed at least once annually.