

Farrel Limited Modern Slavery Act Statement

Our Philosophy

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms and is a complex and multi-faceted problem. The Modern Slavery Act 2015 (MSA) covers four key activities:

1. **Slavery** – Where ownership is exercised over an individual
2. **Servitude** – Involves the obligations to provide service imposed by coercion
3. **Forced and Compulsory Labour** – All work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty
4. **Human Trafficking** – Involves arranging or facilitating the travel of another with the view to exploiting them

All forms of modern slavery have in common the deprivation of a person's liberty by another 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 aspects of our business and business relationships, and in this respect, Farrel Limited remain committed to ensuring modern slavery has no place within our organisation or in our supply chain.

Our Structure

Farrel Limited is an industry leader in designing, manufacturing and installing mixers, pelletisers, compounders, extruders, and mills for the rubber and plastic process industry. Founded in 1900, the company began as David Bridge and Sons, a business that focused on the niche rubber production market. Over the years the company was acquired by Farrel Corporation and renamed Farrel Ltd. In 2008 the companies were acquired by a German competitor and the HF Mixing Group was formed in 2010 together with Harburg Freudenberger and Pomini. As part of the HF Mixing Group, the company has a global footprint with manufacturing facilities in the UK, the United States, Germany, Italy and Slovakia, and service facilities in Asia, India and China.

Our Supply Chain

Our supply chain includes companies that design, develop and manufacture parts and equipment, materials suppliers, transportation and logistics providers, training providers, and other professional services.

As an engineering and manufacturing company, we source raw materials, components and services globally and recognise that this may involve countries with varying risks associated with modern slavery. Our suppliers play a critical role in our business, and our relationships with them are based on achieving the best performance, product delivery times, service, and total cost in an ethical and sustainable manner. In all cases, tier 1 suppliers are obliged to abide by the HFMD Supplier Code of Conduct V1 which details our mandatory requirements for the prevention of modern slavery in the supply chain.

Our Policies on Slavery and Human Trafficking

Modern slavery in all forms, whether slavery, servitude, forced or compulsory labour, or human trafficking is a crime and a fundamental violation of human rights. As a company, we remain absolutely committed to ensuring that there is no form of modern slavery in our business and supply chain. This zero-tolerance ethos is applied to our suppliers and business partners, and we are dedicated to maintaining open and transparent relationships with them to ensure that the highest ethical standards are maintained, regardless of where they are located.

The prevention, detection, and reporting of human rights violations in any part of our business or supply chain is the responsibility of all those working for, or on behalf of Farrel Limited, and we expect those working in this capacity to maintain the utmost standards in conformity with these principles. The Farrel Limited Modern Slavery Policy defines our commitment to acting ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls to ensure slavery and human trafficking are not occurring anywhere in our supply chains.

The following policies are related to, and support Farrel Limited and HFMD's zero-tolerance approach to modern slavery and can be made available upon request:

- FLTD HR 01 Modern Slavery Policy
- FLTD HR 02 Equality Policy
- FLTD HR 06 Labour Practices and Human Rights
- FLTD HR 08 Recruitment Policy
- HFMD GG 05.06.06.1 Supply Chain Sustainability
- HFMD GG 13.04.03 Whistleblowing
- HFMD Code of Conduct Rev1
- HFMD Supplier Code of Conduct V1

Our Due Diligence Process

To minimise Farrel Limited's overall supply chain risk, any new supplier must participate in a formal procurement process before approval. Following approval, the supplier may be audited periodically (determined through a risk-based approach).

In the event there is a suspected breach of either the Farrel Limited Modern Slavery Policy or the HFMG Supplier Code of Conduct V1 this can be reported as per the HFMG Whistle Blowing Procedure via the dedicated web page: <https://whistlefox.heuking.de/start/hf-mixing-group/en>

Alternatively, per email address to: Compliance@hf-mixinggroup.com

The written statement should include the following information:

- Description of the offence
- Date of which the complainant became aware of the offence
- Name of the person suspected of committing the offence
- Any actions are taken (if applicable) before filing the complaint or allegation (e.g., talking to their supervisor)
- The complainant should expect to receive confirmation of receipt of the complaint within 7 working days
- The complainant will **NOT** be harassed, threatened, suspended, demoted, dismissed, or discriminated against due to the communication of a genuine concern, or for raising a suspected serious concern.

All relevant information, including suspicious but unproven cases, will be reviewed, and analysed by a competent person designated by the HFMG Compliance Team. In some cases, this may involve an investigation by a legal advisor or an accountant.

All investigations will be kept confidential to the extent possible. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the whistle-blower, and if necessary, to his/her supervisor. The whistleblower will receive feedback within 60 days of the initial feedback.

Our Training on Modern Slavery

Farrel Limited is committed to training its employees on an ongoing basis. The initial training provides knowledge and guidance on company policy, the definition of modern slavery, what preventive measures must be implemented, and what steps should be taken in the event that any concerns are identified in our supply chain. Annual refresher training is also conducted to maintain awareness and improve our employees' understanding of this complex problem.

Our Modern Slavery Act Statement – Year Ending December 31, 2022

This statement is intended to underpin Farrel Limited's pledge to a zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all of our business transactions and relationships. As well as developing, implementing, and enforcing effective systems and controls to ensure modern slavery does not exist anywhere in our business, or our supply chains.

We are also committed to ensuring transparency in our own operations and in our approach to combating modern slavery throughout our supply chain, in accordance with the disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers, and other business partners and we will continue to include specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as anyone held to slavery or servitude, whether adults or children in our contracting process, and we expect our suppliers to hold their own suppliers to the same high standards.

This statement is published by Farrel Limited pursuant to section 54(1) of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2022. The statement shall be subject to annual review with amendments made where appropriate for future financial years.

Signed for and on behalf of Farrel Limited:



Ian Butterworth
Site Director

25th May 2023