

SWAGELOK MANCHESTER
SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from the Managing Director

Whilst we are not required to comply with The Modern Slavery Act, we believe it is important to state our position. We have a zero-tolerance approach to slavery and human trafficking and aim to conduct business with integrity and the values we demonstrate on a daily basis. Associates are expected to report concerns and management are expected to act upon them.

Organisation's Structure and Business

We are an independently owned private business which distributes fluid system components and sub-assemblies; supported by customer training and associated services. Annual turnover is below £36m.

Our Supply Chains

Our supply chain is primarily from Swagelok Company in Solon, Ohio, USA. We use local suppliers for consumables and support services relating to the distribution operation of around 42 people in Warrington.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk

- We directly employ our associates using reputable recruitment agents ensuring we meet all relevant national legislation and regulations
- We ensure that our associates are aware of their employment rights and issued with a Contract of Employment
- When it is necessary to employ temporary or contract staff, this is done through reputable employment agencies or direct contact with the individual
- Where possible we build long term relationships with our local suppliers who are known to us
- Where our supply chain is national we deal with companies registered at Companies House, are VAT registered and hold ISO9001 quality accreditation.

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- Where our supply chain is international, we deal with organisations that have anti-slavery and human trafficking policies and processes in place or whose owners and or executives are known personally to the Managing Director.
- We have in place systems to encourage staff to report concerns and protect whistle blowers.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

Training

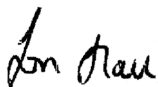
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training to relevant members of staff. All Directors and Managers have been briefed on the subject.

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of quality audit by our Quality Manager
- Communication and personal contact with the supply chain to ensure their understanding of and compliance with our expectations.
- Surveying and auditing suppliers based on an assessment of potential risk.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our statement on slavery and human trafficking.



Jon Hall
Managing Director
Swagelok Manchester
Reviewed: July 2019