

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year 2018-2019.

### Introduction

Grainger and Worrall is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

### Our organisational structure and operations

Grainger & Worrall is the world's leading total castings solutions provider. We are at the forefront of casting development and innovation. Working across the automotive, motorsport and wider transport sectors, we offer world-class excellence in structural casting, machining, engineering and rapid prototyping. We have two manufacturing companies in Shropshire and one in Worcestershire.

The Group employs 690 people; the majority of whom work in the UK along with business development managers in Europe and the United States of America.

The Group has a global annual turnover of £62 million.

### Nature of our supply chains

The Group's key supply chains consist of two main categories:

1. Commodities - bought out products, sand, metals, resins, etc.; and
2. Services – machining, heat treatment, painting, etc.

Grainger & Worrall operates a code of ethics that includes "Corporate Social Responsibility" which addresses human rights throughout the supply chain as defined in the Supplier Quality Manual. The majority of the tier one suppliers to the Grainger & Worrall Group are based within the UK or Europe.

### Policies relating to slavery and human trafficking

Our Supplier CSR policy reflects our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains. We ensure that our suppliers are aware of our policies.

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing procedure. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Supplier Code of Ethics. This code explains the way we expect our employees and suppliers to act regarding supply of goods and services to Grainger and Worrall.

### Risk assessment

We use the following processes to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking.

- Grainger & Worrall require that all potential new suppliers complete a supplier pack prior to the supplier being considered for inclusion on the "GW Approved Vendor List". Existing suppliers are required to complete the supplier pack where changes to location and/ or ownership arise and every 3 years as a minimum. Within the supplier pack, there is a section that must be completed addressing modern slavery/ human rights.
- Prior to a supplier being awarded any business, the supplier pack is reviewed and consideration is given to the information provided by the supplier, including their geographical location which is reviewed against the global slavery index data (enslaved high risk areas).
- Wherever possible Grainger & Worrall will refrain from sourcing products or services from these high-risk areas, either on a direct or indirect basis.

- All Key suppliers to Grainger & Worrall will be subject to on site 2<sup>nd</sup> party audits at a maximum time scale of every three years, part of this audit reviews the suppliers implemented policies & controls regarding human trafficking & modern slavery within their supply chain.
- Where there is no other option than to source either directly or indirectly from these high-risk areas, Grainger & Worrall will take all reasonable steps to ensure that the products or services are sourced from reputable companies where conformance to human rights can be verified.

Based on these processes, we have identified the following activities to be at highest risk of infiltration in relation to slavery and human trafficking

- Raw materials used in our casting process are considered to be at highest risk as they are globally sourced;
- The supply chains for the raw materials are considered to be the highest risk. Although sourced mainly through UK & European based suppliers, these raw materials are purchased from a growing global market that is driven by cost & availability.

We seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking.

### **Due diligence processes in relation to slavery and human trafficking**

To monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains, we aim to undertake the following due diligence processes in relation to new suppliers identified as being high risk according to the risk assessment procedures described above.

Prior to orders for business being placed, Grainger & Worrall requires all new suppliers to complete a vendor assessment questionnaire, within which is a section that addresses modern slavery and human rights.

Prior to a supplier being awarded any business, the supplier pack is reviewed and consideration is given to the information provided by the supplier, including their geographical location which is reviewed against the global slavery index data (enslaved high risk areas).

Wherever possible Grainger & Worrall will refrain from sourcing products or services from these high-risk areas either directly or indirectly. All key suppliers to Grainger & Worrall are sent a separate questionnaire on an annual basis to ensure that they are meeting the guidelines regarding slavery & human trafficking in their own supply chains.

We use the following key measurements to monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

Grainger & Worrall monitor the data from its supply chain regarding the geographical areas from which products & services are sourced (both directly & indirectly) and, where a supplier is considered as a high or medium risk, Grainger & Worrall will, wherever feasible, carry out supplier audits to ensure that the suppliers and their supply chain are complying to all applicable laws, statutes and regulations regarding slavery & human trafficking.

### **Staff training**

We facilitate training to staff who hold responsibility for selecting key suppliers to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

### **Monitoring of our due diligence processes**

We use the following key performance indicators (KPI's) to monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

- The data from the vendor assessment questionnaires pertaining to slavery & human trafficking are reviewed along with the geographical location of suppliers and then rated as low, medium or high-risk categories.
- In addition to the vendor assessment questionnaire, 2<sup>nd</sup> party audits are also conducted where a more in-depth section regarding slavery & human trafficking controls are investigated.

As a result of the Group's assessment process, we are pleased to confirm that no suppliers have been identified as high risk & only one supplier identified as a possible medium risk based on geographical location. This supplier is monitored and subjected to 2<sup>nd</sup> party audits.

Signed on Behalf of Grainger & Worrall

A handwritten signature in black ink, appearing to read 'M. King', is written over a horizontal dotted line.

CEO  
April 2019