



ANNUAL SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

This annual Slavery and Human Trafficking Statement is made in pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2019. In this statement we set out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in our supply chains, or in any part of our own business. We include details of our activities, supply chains and the actions we have taken and are taking to ensure that modern slavery is not deliberately or inadvertently supported by us. The content of our modern slavery statement will evolve over time, to demonstrate a year-on-year improvement outlining practical progress on how we are tackling the risks and incidence of modern slavery in our operations and supply chains.

Statement of Commitment

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels: directors, consultants, contractors, agency workers, volunteers, interns, business partners and our supply chain.

Our Business Structure, Business and Supply Chain

The principle activity of the group is the manufacture of mould and core coatings, recarburisers, coal dust and coal dust substitutes for green sand foundries. In addition, carbon powders and granules are supplied for the rubber, refractory, steel, glass, coal tar enamel and friction industries. We sell to customers throughout the world and our supply chain is also worldwide.

Policies and Responsibility

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.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented..

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we also recognise that we do not directly control the conduct of individuals and organisations in our supply chains.



To underpin our compliance with practical steps, we intend to implement the following measures:

- 1 Conduct risk assessments to determine which parts of our business and which of our customers are most at risk of modern slavery, so that efforts may be focused on these areas.
- 2 Engage with our customers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business.
- 3 Identify and monitor potential risk areas in our supply chains to ensure all customers and suppliers are adhering to the Anti-Slavery Policy. This includes obtaining their Slavery and Human Trafficking Statement where available.
- 4 Protect Whistle Blowers.

The following senior staff manager(s) has/have responsibility for the enforcement of our policies:

Graham Hooper, Finance Director

Risk Assessments

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

We are currently in the process of sending our Modern Slavery Statement & Policy to all our recent suppliers and also to customers that request the Statement.

We have identified our suppliers outside Europe and North America to have the largest risk attached to them. We are paying particular attention to suppliers in these areas firstly requesting a Slavery and Human Trafficking Statement if this is available. Should insufficient evidence be obtained we may conduct random inspections to report on the working conditions, pay and welfare of staff. Suppliers that are deemed to be of high risk will be vetted and reviewed annually.

Any new suppliers will be asked for a Slavery and Human Trafficking Statement.

Any suppliers that fail to meet our standards will be asked to take action to improve their policies. Failure to comply following this request could result in the ending of the business relationship.



Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. We also require our business partners to provide training to their staff and suppliers.

Christopher Durrans
Managing Director
James Durrans & Sons Limited & Carbon International Limited

31st March 2019