

Modern Slavery Statement 2023

Introduction

Modern slavery takes many forms but includes the trafficking of people with a view to exploiting them, servitude, forced or compulsory labour, bonded labour, and child labour.

We recognise that all businesses have an obligation to help prevent slavery and human trafficking in their own organisation and supply chain. We take our responsibility seriously and we recognise that we work within a sector(manufacturing) that is at greater risk of incidents of modern slavery.

We strictly prohibit the use of modern slavery within our own organisation and our supply chain. This statement highlights our compliance with the Modern Slavery Act 2015 and outlines the steps we have taken to reduce the risk that modern slavery is not taking place within our organisation or supply chain.

Organisational Structure

Centriforce Products Ltd operates in the plastics processing and recycling sector, we manufacture a range of products from recycled plastics which help to prevent damage being caused to people, assets, or utilities.

We are an SME manufacturing business with a single production site and office based in Liverpool, UK. We employ around 90 people at our site in Liverpool, providing roles in accounting and administration, engineering, production, quality, technical, sales and logistics.

Most of our workers are employees, hired on permanent contracts of employment. However, when production requirements dictate, we occasionally source temporary agency workers through employment agencies into factory/production-based roles.

Processes and due diligence in our own organisation

We are an ethical employer, who foster an environment of mutual respect, responsibility, honesty, and integrity within our organisation. All our employees and workers are expected to work to the company core values of honesty and integrity, teamwork, performance, personal accountability, and customer focus.

Our organisational policies recognise, respect, and protect the human rights of our employees and workers. Our legal responsibilities as defined by law form the basis of these policies and procedures, which include.

- Health and Safety Policy
- Antibribery & corruption policy
- Equality, Diversity, and Inclusion policy
- Anti-slavery and Human Trafficking policy
- Bullying and Harassment policy
- Whistleblowing policy

These policies are reviewed annually to ensure that they continue to meet the needs of the business and comply with the relevant laws/regulations. In the financial year 2022/23, we renewed our commitment to the prevention of modern slavery and human trafficking by updating our policy and introducing positive steps to raise awareness amongst our employees and suppliers.

As an employer we also aim to align ourselves to the guidance provided by the Ethical Trading Initiative base code in our relationship with our employees, we ensure the following.

- 1.) Employment is freely chosen.
- 2.) Freedom of association
- 3.) Working conditions are safe and hygienic.
- 4.) Child Labour shall not be used.
- 5.) Living wages are paid.
- 6.) Working hours are not excessive.
- 7.) Regular employment
- 8.) No discrimination
- 9.) No harsh or inhumane treatment

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or within our business. Our policy, Modern Slavery and Human Trafficking outlines our zero-tolerance approach and places a responsibility on all those that work with us, or on our behalf, to prevent, detect, and report all instances or suspicions of modern slavery in our business and supply chain.

Our aim is to encourage openness and transparency and we will support any worker, employee or contractor who raises genuine concern in good faith their suspicion that modern slavery of whatever form is or may be present in any part of our business or supply chain. Our whistleblowing policy outlines the steps to follow and the rights and protections for those individuals.

At least 50% of our workforce are employed in operational-based roles, which are defined as a high-risk category for instances of modern slavery. To combat this risk internally, most of our employees are employed on permanent full-time contracts. Each employee has a legal obligation to provide their proof of right to work before employment is confirmed and these checks are done internally following government guidance.

On occasion, we do require additional support and we will utilise the services of recruitment agencies and employ temporary staff. We will only use reputable employment agencies and in line with our 'new supplier on boarding process', these agencies are required to demonstrate that they comply with the standards set by their own organisation or ours in the prevention of modern slavery and human trafficking.

Every agency worker on our site is also required to prove their proof of right to work to us directly to ensure that we are not employing illegal migrants, who we recognise, as vulnerable to exploitation.

Supply Chains

Suppliers to our company include the following.

- Goods (including raw materials for the production process), consumables (office stationery, PPE, engineering parts) and Equipment.
- Services (including contractors for engineering works, cleaning staff, training providers.)
- Labour (employment agencies)

Our business has up to 150 suppliers, supplying us with direct and indirect goods and services. Of these, we use around 75 suppliers regularly.

The largest spend for our organisation is on raw materials, this spend is spread over a selection of core suppliers. We recognised that these materials could have been originally manufactured in any part of the world and therefore a greater risk of instances of Modern Slavery within our supply chain.

90% of our suppliers are based in the UK with the remaining 10% based in the EU & China. 95% of our supplier base is SME's.

Our concern is the management of labour in these supply chains. We require our suppliers to operate ethically

and within the scope of UK Law or local laws in their country of origin.

When we engage with a new supplier, we ask for evidence of their policies and processes around modern slavery and human trafficking. We recognise that smaller organisations may not have the resources or knowledge to actively prevent modern slavery in their own organisations, in which case we support them by providing awareness of modern slavery and sharing our commitment and achievable expectations for them to follow to supply our business.

As part of our approved supplier scheme, prospective suppliers of goods and services are required to confirm that they will abide by our standards and strictly prohibit the use of modern slavery and trafficked labour, both adults and children.

We aim to build honest and lasting relationships with our supplier base, we expect our suppliers to act ethically and with integrity in all their business dealings, we also expect them to promote these standards in their own supply chains.

We reserve the right to audit a supplier's organisation for compliance with our modern slavery and human trafficking policy. If our expectations are breached by a supplier or contractor, we will act decisively and may terminate our relationship with them. We are committed to engaging with our direct suppliers to promote awareness and build on our current measures so that they in turn can tackle the issue further down the supply chain.

Training

We have recently renewed our commitment to tackling modern slavery and human trafficking in our organisation and supply chain by revisiting our policy to ensure that it meets our needs and ambitions. We have shared this with our supplier base and introduced a commitment required from our suppliers.

We recognised that awareness and positive action is required in our own organisation and therefore we have taken steps to educate key personnel of the issues, and how to identify the risks and processes to mitigate risk in our own organisation and supply chain. We have involved our HR Advisor and Supply Chain personnel and Head of Operations in the production of and roll out of our current measures/ processes.

However, we understand that further awareness training is required across our business, and we are committed to training relevant employees in, awareness, how to identify, and how to respond to instances of modern slavery or human trafficking.

The Future

Centriforce is fully committed to.

- Roll out and extend awareness training within our own organisation by developing training documentation and utilising external training suppliers where necessary.
- Continue to develop and implement risk mitigation procedures and processes to reduce the risk of modern slavery in our own business and our supply chain.
- Fully map our supply chain and identify our high-risk suppliers.
- Conduct regular audits of those high-risk suppliers and provide support and recommendations for improvements where identified.
- Develop KPI's to monitor and evaluate activities undertaken in line with our commitment to eradicate Modern Slavery.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Centriforce Products Ltd Modern Slavery Statement for the financial year ending in 2023.

This Statement has been agreed by Centriforce Products Ltd Board of Directors on 15th December 2023 and signed off on its behalf by a Director of the Company.



Simon Carroll
Chief Executive Officer
Centriforce Products Ltd