

Group Policy

Modern Slavery & Human Trafficking Statement

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken and will continue to take to ensure that our business; as well as our supply chains are free from slavery and human trafficking.

The Welding Alloys Group is committed to a zero tolerance of slavery and human trafficking in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices. The Welding Alloys Group are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same.

Our business activities and structure

Welding Alloys' unique experience is drawn from more than 50 years of commitment to research and development of specialised products and solutions within the welding industry.

We are the go-to provider of advanced welding consumables, automated equipment for wear protection, and engineered wear solutions. We achieve this through a total commitment to our customers, our people and innovation.

We cover more than 150 countries and territories throughout a network of over 28 subsidiaries and with more than 1000 employees. Our global headquarters are registered at The Way, Fowlmere, Nr. Royston, Hertfordshire, SG8 7QS.

Nature of our Supply Chains

In respect of the provision of our products and services, we require our business activities to run efficiently and effectively, we therefore look to source from reputable and recognised organisations, vetting for suitability wherever practicable. Our supply chain relates to the provision of the goods and services that an organisation involved in the provision of welding solutions would normally require.

Our international supplier relationships are managed locally with the assistance of our Group Purchasing Department based in France.

Policies

The Welding Alloys Group have a number of policies in place that outlines our commitment to enforcing effective procedures and controls in order to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to ensure we act ethically and with integrity in all our business activities and relationships.

Welding Alloys has established an Ethical Trading Statement which is available on our website. This details how we comply with the legislation which is applicable to Ethical Trading, and also sets out the standards we expect of our suppliers. In particular, this Ethical Trading Statement addresses such matters as: conditions of employment; wages

and benefits; child labour; modern slavery (which may also be referred to as forced labour) and human trafficking. It also includes other related matters such as safety and environmental policies.

To ensure that our policies and standards are communicated as effectively as possible, we have established a specific Code of Conduct which applies specifically to the organisations that supply us with the goods and services we sell. Our Code of Conduct on ethical trading includes compliance with our policy on modern slavery and human trafficking.

These policies include, but are not limited to:

- Anti-Corruption & Bribery Policy
- CSR Policy
- Bullying & Harassment Policy
- Equal Opportunities Policy Statement
- Ethical Trading Statement
- Health & Safety Statement along with various policies and procedures
- Modern Slavery & Human Trafficking Statement
- Supplier Code of Conduct
- Welding Alloys Commitment, Values and Principles
- Whistleblowing Policy

Staff Training / Awareness

We facilitate training and awareness of our policies and procedures to key employees through our induction programmes and our Welding alloys on-line Academy to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and we effectively operate our policies and procedures aimed at mitigating this risk. Policies and procedures are also available within company handbooks, our company intranet SparkNet and policy statements are available on our company website.

- In 2021 we launched an internal intranet site called Sparknet and all our policies and procedures are available on that site.
- In 2022 we are looking at improving our Compliance training modules and to include them on an LMS platform.

Due Diligence Processes in Relation to Slavery and Human Trafficking

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 chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains everyone within our organisation should keep alert internally and when dealing with suppliers. Many of our employees have the opportunity to make observations when visiting a supplier's premises and more frequently when service providers attend our facilities.

This statement along with our Supplier Code of Conduct is sent to our Key Vendors and a record is kept of their signed agreement (or their own Code of Conduct) on our ERP system NetSuite.

Whilst the Board have overall responsibility for ensuring the policy complies with our legal obligations; everyone has a responsibility to ensure the prevention, detection and reporting of modern slavery and human trafficking either in the business or supply chain. Everyone has a responsibility to ensure they avoid any activity that may breach or lead to a breach of this policy.

Any concerns should be reported to the appropriate level of management, the HR Department or via our whistleblowing policy.

The parts of our business and supply chains where there could be a risk of modern slavery or human trafficking taking place, and the steps we have taken to assess and manage that risk

We consider that the risk of modern slavery is greatest in our supply chain and so we have taken the following steps to assess and manage that risk:

- Internal awareness as noted above
- Code of Conduct for Suppliers that we ask them to sign

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

However, we will continue to monitor our supply chain, external and internal operations to check for compliance and that this policy is being implemented effectively.

Review

This statement will be reviewed by the Group's Board of directors on a regular basis (at least annually) and may be amended from time to time.

This statement has been approved by the Board of Directors and signed by Dominic Stekly, the CEO of the Welding Alloys Group.

Signed:
Dominic Stekly CEO
January 2022

