

# Group Policy - Modern Slavery & Human Trafficking Statement

## Introduction

In compliance with Section 54 of the Modern Slavery Act 2015, the Welding Alloys Group hereby outlines its ongoing and future commitments to ensure that all aspects of our business and supply chain remain free from slavery and human trafficking. We maintain a zero-tolerance stance on these practices and are dedicated to conducting business ethically and with integrity across all operations and relationships. Furthermore, we expect the same high standards from our supply chain, contractors, employees, and business partners.

## Our Business and Structure

Welding Alloys, with over 50 years in the welding industry, stands as a pioneer in offering specialised products and solutions. We are recognized globally as a provider of advanced welding consumables, automated equipment for wear protection, and engineered wear solutions, driven by a commitment to innovation, customer service, and ethical business practices. Our operations span over 150 countries through a network of 30 subsidiaries, employing more than 1,100 dedicated staff. Our global headquarters is located at Unit 20 Goldthorpe Industrial Estate, Commercial Road, Goldthorpe, Rotherham, S63 9BL.

## Our Supply Chains

Our supply chains are integral to our operational efficiency and the quality of our solutions. We engage with reputable and recognised organisations, ensuring our procurement practices meet our high standards of ethical conduct and compliance. Our international supplier relationships are managed locally and also with the support of our Group Purchasing Department in France, ensuring alignment with our ethical and compliance standards.

## Policies and Commitments

The Welding Alloys Group maintains a number of policies designed to reinforce our commitment towards implementing effective measures and controls. These measures aim to reduce the risk of human trafficking and modern slavery infiltrating our business operations or supply chains, ensuring that we conduct our business ethically and with integrity across all transactions and partnerships.

Key policies include:

- Anti-Corruption & Bribery Policy
- Corporate Social Responsibility (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

Specifically, the Ethical Trading Statement covers crucial areas such as employment conditions, compensation and benefits, the prohibition of child labour, and the eradication of modern slavery (also known as forced labour) and human trafficking, in addition to addressing safety and environmental considerations.

### **Training and Awareness**

We actively engage in educating and raising awareness of this policy among our employees. This is achieved through our Induction programs and the Welding Alloys online Learning Management System (LMS), Sparkademy. Our goal is to ensure employees are well-informed about the potential risks of modern slavery and human trafficking within our business or supply chains. Through these platforms, we strive to effectively implement policies and procedures designed to mitigate such risks. Additionally, our policies and procedures are accessible in company handbooks, on our company intranet, SparkNet, and through policy statements on our website. Below are some key milestones:

- **2021:** We launched SparkNet, an internal intranet site where all our policies and procedures are readily available for employees. We continually update the information within that platform.
- **2023:** We introduced Sparkademy, a new and advanced Learning Management System, to further enhance our training capabilities and accessibility of information.
- **2024 Plans:** We are committed to revising and updating our ethical policies and procedures. This includes refreshing our Compliance Module on Sparkademy to reflect the latest standards and practices.

### **Due Diligence and Risk Assessment**

While we fully recognize our legal obligations to detail the actions we've undertaken to prevent modern slavery and human trafficking within our supply chains, we also understand that we cannot dictate the behavior of individuals and organizations within those chains. To monitor and reduce the risk of slavery and human trafficking, it is vital that everyone in our organization remains vigilant, both in-house and in interactions with suppliers. Our employees frequently have the chance to make critical observations during visits to supplier sites or when service providers come to our premises.

We reinforce our commitment by distributing our Supplier Code of Conduct to our primary vendors, maintaining records of their acknowledged agreement (or their respective Codes of Conduct) within our ERP system, NetSuite.

While the Board bears the ultimate responsibility for ensuring our policy meets our legal responsibilities, the duty to prevent, identify, and report instances of modern slavery and human trafficking, whether within our operations or our supply chain, rests with each one of us. We must all avoid any actions that might contravene this policy.

Should anyone have concerns, they are encouraged to speak up through the appropriate managerial channels, the HR Department, or by utilizing our whistleblowing policy.

In identifying where the risk of modern slavery and human trafficking is most pronounced within our business and supply chains, we have acknowledged that our supply chain poses the greatest risk. Accordingly, we have implemented the following measures to evaluate and manage this risk:

- Promoting internal awareness as previously mentioned.
- Implementing a Supplier Code of Conduct, which we require our key suppliers to agree to and sign.
- We maintain a vigilant stance, encouraging employees and partners to report any concerns through our management channels or whistleblowing policy.

### **Performance Indicators**

The success of our initiatives to eliminate slavery and/or human trafficking within our business and supply chain will be evident by:

- Our monitoring of any reports from employees, the public, and law enforcement agencies.
- The information on Code of Conduct stored within our ERP system, NetSuite
- Raising awareness with our employees and ensuring key employees have completed the training on Sparkademy.

Nevertheless, we remain committed to ongoing vigilance regarding our supply chain, as well as our internal and external operations, to ensure adherence to compliance and the effective implementation of this policy.

### **Review and Governance**

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  
April 2024