

M.A. FORD Europe Limited



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Modern Slavery Policy

M.A.FORD Europe Limited is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company acknowledges its responsibility within the Modern Slavery Act 2015 through publication of a policy statement setting out the steps we take to prevent modern slavery and related.

Introduction

This statement sets out M.A.FORD Europe Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2018/2019.

As part of a high-tech progressive, global engineering group offering advanced products and services that enhance its customers' productivity and profitability, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Company structure and supply chains

This statement covers the activities of M.A.FORD Europe Limited:

- The business is organized into two business areas and our customer segments are: engineering industry, energy industry, automotive industry, construction industry, aerospace industry, medical industry and die & mould market sectors.
- M.A.FORD Europe Limited endeavours to become their customers preferred partner for High Performance standard and engineering cutting tool solutions with the highest innovation available, in collaboration with carefully chosen technology partners, whilst maintaining a competitive price structure.

Countries of operation and supply

The Company currently operates in the following countries either directly or through a distribution network:

EU

Russia

South Africa

Responsibility

Responsibility for the Company's anti-slavery initiatives is as follows:

- Policies: Managing Director, Management Team and Policies Manager

- Risk Assessments: Managing Director, Management Team & Quality Manager
- Training: Managing Director, Management Team & Policies Manager

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- Whistleblowing policy the Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- Employee code of conduct the Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- [Supplier/Procurement] code of conduct the Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Company works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship.

Due diligence

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence and reviews include:

- We include a Supplier Compliance Questionnaire within our supplier selection procedure and in addition to this self-declaration, the environment (combination of human and physical factors) where our supplies operate must be verified during initial or periodic visits on site.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect suppliers to M.A.FORD Europe Limited and its affiliates to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- requiring the relevant staff to have completed training on modern slavery by April 2019;
- developed a system for supply chain verification in place since 20th September 2017, whereby the Company evaluates potential suppliers before they enter the supply chain.

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 will provide training to relevant members of staff. All Directors have been briefed on the subject. Training provided is recorded on individuals training records and Training charts

The Company's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the Company;
- what external help is available, for example through the Modern Slavery Helpline.;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

Awareness-raising programme

As well as training staff, the Company will raised awareness of modern slavery issues by putting up posters across the Company's premises and circulating a series of emails to staff.

The posters and emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the Company; and
- what external help is available, for example through the Modern Slavery Helpline.

Board/Member approval

This statement has been approved by the Company's Managing Director, who will review and update it annually.

DWard