



DONCASTERS

Modern Slavery Act Statement 2021

Why do we produce a Modern Slavery Act statement?

The Modern Slavery Act (the 'Act') became law on 26 March 2015. Section 54 of the Act, 'Transparency in Supply Chains', requires every organisation carrying on a business in the UK with a total annual turnover of £36m or more to produce an annual Statement; setting out the steps they have taken to tackle slavery and human trafficking in their organisation and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Our organisation

Doncasters is a leading international manufacturer of high-precision alloy components. Our manufacturing facilities are located in Europe and the USA but we both source materials and sell into markets across the globe. As a result, we take a global approach to dealing with modern slavery and child labour.

Our principles

We believe that everyone, everywhere has the right to live their life free from slavery and abuse.

Our company is built on clear values of mutual respect and equality.

We have zero tolerance for exploitation of any kind and understand that it comes in many forms, including human trafficking, forced labour, debt bondage/bonded labour, descent-based slavery, and child labour.

We recognise that slavery has been linked to certain raw materials commonly used in our industry, such as nickel and cobalt mining. We are working hard to ensure that materials linked to exploitation do not enter our supply chain.

Our policies

In 2021 we have revised the following policies, procedures and agreements which form part of our approach to mitigate against the risk of modern slavery within our own companies or our supply chain:

- Code of Ethics
- Procurement Policy
- Speak Up Policy and Hotline
- Diversity and Inclusion Policy
- Anti-Harassment Policy
- Grievance Policy and Procedure

Our ethical code

In 2021 we have revised our Code of Ethics and following its adoption will refer to it as a Code of Conduct, reflecting a wider scope than simply ethics. The Code of Conduct will... (continued)

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be available both as a booklet (using recycled paper) and on our website. We will be asking all suppliers to adhere to it or to principles that are no less strenuous in our contracts.

Enhanced Due Diligence

From 2022, when we are signing up long term contractual partners, we will be asking them to complete new questionnaires which will include questions around the minimum age of their workers, adherence to labour laws, adoption of living wages (where applicable) and adherence to modern slavery legislation or its equivalent. Where necessary we will supplement their questionnaires with third-party checks using risk intelligence data.

Contracts

We inform our suppliers and contractors that we have a zero-tolerance approach to the practice of modern slavery, child labour, trafficked, bonded or compulsory labour in any forms. Our standard supplier contracts now include the right to terminate in the event that we find or have reasonable grounds to suspect that any form of forced or involuntary labour, including but not limited to modern slavery, is being used.

Where our negotiation position does not enable us to use our contractual terms, we always look for similar clauses in the supplier's terms and conditions or we ask for them to be included. Our procurement teams have been asked to highlight where they are unable to get suppliers to agree to such terms prior to signing agreements and we seek either alternative suppliers or ways to reassure ourselves that such companies are acting ethically.

Awareness and training

This year we have focused on revising our ethics code, updating the supporting policies, drafting a new checklist for onboarding new suppliers, improving our contractual terms, and improving our screening processes.

Raising awareness and training will be a key focus of 2022. Once our employees have been trained on our revised Anti-Modern Slavery Policy, we will expect them to recognise and report any suspicions they have on modern slavery.

We will ensure that as part of the onboarding process all staff are made aware of our new Code of Conduct, the Anti-Modern Slavery Statement and supporting policies.

Effective monitoring

We will monitor the effectiveness of this Policy Statement within our supply chain as we work towards ensuring we have complied fully with:

- all new suppliers completing a new procurement questionnaire
- all applicable new contracts having contractual provisions relating to the prevention of modern slavery
- the introduction of a new Code of Conduct aimed at suppliers as well as other Doncasters' stakeholders
- training raising awareness of Modern Slavery and Doncasters' zero tolerance to it for existing and new suppliers

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DONCASTERS

This statement applies to Doncasters Group, which includes the following UK companies:

- Doncasters Limited
- Deritend International Limited
- Trucast Limited
- Ross & Catherall Limited

Review and responsibility

The Doncasters Board of Directors has overall responsibility for ensuring that this statement complies with our legal and ethical obligations and that it is reviewed on an annual basis. The Executive is responsible for raising awareness and implementing the policies supporting this statement.

The devolved procurement teams and the Internal Audit function have responsibility for implementing this policy statement and monitoring its effectiveness at individual company level.

Approval

This updated statement was approved by Doncasters Board of Directors on 24 August 2021.

For and behalf of the Doncasters Group Board of Directors

Mike Quinn
Chief Executive Officer
Doncasters Group