

Modern Slavery Act 2015

Modern slavery and human trafficking statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Sicut Enterprises Limited ("Sicut") is committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sicut's slavery and human trafficking statement for the financial year ending 31st March 2019

Organisational structure

Sicut is a provider of recycled polymer composite structural products, including railway sleepers, in the rail and construction sectors.

Our supply chains

Our supply chains include the sourcing of raw materials and sub-contract manufacturing services.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Particular reference is made to our Corporate Social Responsibility Policy and our Supplier approval processes.

Due diligence processes for slavery and human trafficking

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we are developing a supply chain compliance programme within our Supplier approval processes through which we will:

- Identify, assess and monitor potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

We expect all of our suppliers to adhere to our values and to ensure that:

- They do not use slave labour, illegal child labour or forced labour
- They create a safe working environment for all
- They will ensure that the overall terms of employment are voluntary
- They shall follow all local applicable laws relating to minimum age and minimum wage requirements
- They will follow all local applicable laws relating to the number of hours worked
- They will listen when legitimate concerns are raised, and wherever possible take action to address them

We expect our suppliers to be able to demonstrate compliance with this Policy at the request and to our satisfaction.

Sicut will thoroughly investigate any claim or indication that a supplier is acting in breach of this policy. If a supplier is found to be in violation of this policy, Sicut will take prompt, remedial measures to address the violation.

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 intend to provide training to our staff. We also will expect our suppliers to provide training to their staff.

Further steps

We will conduct a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains in order to identify any further steps that might be taken to combat slavery and human trafficking.

Policy authorised by:

Date: 13 May 2019

WILLIAM MAINWARING
CEO

