

## **MODERN SLAVERY STATEMENT OF CARCLO**

### **FOR THE FINANCIAL YEAR ENDED 31 MARCH 2020**

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes the Modern Slavery Statement for Carclo plc and its relevant UK group subsidiaries\* for the financial year ended 31 March 2020.

#### **Introduction**

Carclo is opposed to all forms of unethical behaviour. We note the harmful impact that modern slavery has on individuals and society and are committed to the prevention of such illegal practices.

#### **Our businesses and supply chains**

Carclo is a global manufacturer of fine tolerance injection moulded plastic parts mainly for the medical and optics markets, and a leading supplier of aviation control cables in Europe.

The majority of the products manufactured by Carclo are manufactured in the UK, USA, China, India, Czech Republic and France.

Carclo's largest markets are the USA and UK. Carclo companies operate in UK, USA, India, China, France and Czech Republic.

Carclo's product range and list of suppliers is extensive.

#### **Group wide policies in relation to Modern Slavery**

Carclo has a number of policies which apply on a group wide basis. Some key policies and related principles are noted below:

- Our Policy on Modern Slavery and Human Trafficking sets out a number of fundamental principles and values. The policy refers to our understanding of modern slavery, human trafficking and prohibiting forced or child labour.
- Our Whistleblowing Policy encourages reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation. It applies to workers and other stakeholders, including suppliers.

#### **Steps taken to address Modern Slavery risk**

Carclo's global businesses all operate under the above policies; however underlying processes vary from country to country.

Carclo has established processes and procedures that are designed to prevent modern slavery and human trafficking within our own business and within our supply chain. These start with the induction process, where all new colleagues are asked to view the policy and acknowledge they have read and understood its contents. Training modules for colleagues are currently under development.

#### *Supplier audits and risk assessments*

In respect of the CTP Division of Carclo, and the suppliers of products, all suppliers are asked to agree to the Group's policies on Modern Slavery and Human Trafficking and Anti-Bribery & Corruption as a pre-requisite to be a supplier. In higher risk countries such as India and China, audits are carried out on the suppliers. Initial onsite audits are undertaken. Following this initial assessment, regular onsite audits are conducted thereafter, usually on an annual basis. Audits are undertaken more frequently where a supplier has scored low, in order to verify they are taking action and making progress. Working conditions and ethics are assessed, as are areas such as quality management and health and safety. The audit results inform CTP's assessment of risk and decision as to whether to work with the supplier.

In respect of the Aerospace Division of Carclo, and the supplier of products, suppliers are asked to ensure they meet the quality management standards for the aerospace industry. Aerospace Division also undertake an annual appraisal of suppliers which includes a section around ethical behaviour, and this forms part of the EN9100 certification process.

#### *Reporting Concerns*

Carclo has a confidential whistleblowing process for the reporting of concerns. It is available to employees and also agents, contractors, suppliers and customers of Carclo. The whistleblowing process is promoted widely across sites.

#### *Certifications*

Aerospace Division of Carclo has achieved accreditation against EN9100, quality management standards for the aerospace industry, in all parts of the supply chain.

#### **Further enhancements**

Further enhancements to the procurement and supply chain processes of the Carclo group in the UK and more widely in respect of Modern Slavery are being evaluated.

We found no instances of modern slavery in our supply chains in 2019-2020 and we remain confident that we are well placed to address any that may be identified in our normal business operation.

In particular, we will continue to raise awareness of modern slavery and human trafficking amongst our colleagues and customers, progress our efforts to tackle modern slavery and human trafficking as a financial crime and collaborate with our external stakeholders.

We will continue to monitor, embed and evolve the way we identify and mitigate modern slavery and human trafficking risks in our business and supply chain and publish an updated statement annually.

This statement is approved by the Board of Carclo plc and its relevant subsidiaries in relation to the financial period ended 31 March 2020.



Antony Collins – Group Chief Executive, Carclo plc  
27 May 2020

\*for 2020, this included all relevant, active UK subsidiary companies according to the requirements of the Modern Slavery Act 2015; Carclo plc, Bruntons Aero Products Limited, Carclo Technical Plastics Limited.