



**Cooper Turner Beck**  
FASTENERS FOR SAFETY CRITICAL APPLICATIONS

**Modern Slavery and Human Trafficking In  
compliance with The UK Modern Slavery Act 2015  
SECTION 54 STATEMENT**

and

**UK Modern Slavery Act (2015): Section 54.  
Annual Slavery and Human Trafficking Statement**

## **Company Policy on Modern Slavery and Human Trafficking**

### **In compliance with The UK Modern Slavery Act 2015**

The Cooper Turner Beck Group ('the company') operates from its corporate headquarters in Sheffield, England. Its principal business sectors are manufacturing industrial fasteners and it employs staff in some 8 countries.

Our corporate supply chain is highly complex and involves direct purchases of goods and services as well as from indirect sourcing via contractors, agents, wholesalers, importers, and stockists.

The company is opposed to all forms of slavery and human trafficking and takes a proactive approach to ensuring that none of its operations is involved in such practices and that all significant suppliers formally undertake that they are aware of no such practices in their own operations or those they deal with.

Such practices include the use of family workers without adequate reward, payments below the statutory minimum wage or rates set out in an applicable collective agreement, unpaid internships, work experience assignments of more than one calendar week and unpaid voluntary work of more than one day's duration (except when seconded to a registered charity, military conscription or as part of a penalty set down by penal authorities).

The company carries out an annual review of all written undertakings made by suppliers and a spot check on at least three major suppliers. A senior manager at each location is also requested twice each year to conduct a review of all operations within the direct control of the company to ensure that all employees are on the payroll and appropriate checks have been made on the work and residence permits of all foreign workers (other than between EU countries and where free movement of labour is permitted).

Any employee found to have had any significant role in the establishment or furtherance of slavery and/or human trafficking in any way — directly or indirectly — or to have conspired/colluded with others (knowingly or unknowingly) shall be subject to company disciplinary procedures — which could amount to their dismissal.

Likewise, any supplier found to be profiting from the proceeds of slavery and/or human trafficking — either directly or indirectly — shall have their contract terminated or suspended within whatever provisions are permitted without penalty under existing terms and conditions.

This policy forms section 3 of Cooper Turner Beck's overall Corporate Responsibility Policy.

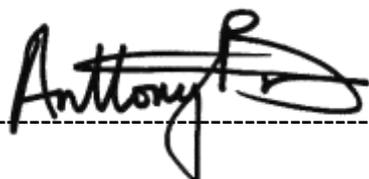
## **SECTION 54 STATEMENT**

### **UK Modern Slavery Act (2015): Section 54. Annual Slavery and Human Trafficking Statement**

#### **Cooper Turner Beck Group:**

1. Although the company has in place clear policies to prevent slavery and human trafficking in its own organization it also takes very seriously the dangers of such malpractices in its supply chain.
2. The company employs 1,100, operates in over 8 countries and its principal business activities are the sale and distribution of industrial fasteners. It sources its raw materials and services from over 6 countries worldwide.
3. It is established company policy to ensure that all operations and transactions are within the laws of the countries where we operate. We further seek to apply the highest international standards, wherever possible, in the way we employ people and do business. We also apply such standards to the management of outsourced services, temporary workers, and self-employed contractors.
4. Amongst our principal concerns is to ensure that none of our suppliers uses child labour for the fulfilment of our orders for goods or services. We also require them to pay at least the minimum wage for all hours worked or - in the absence of a statutory national minimum wage - at least 40% of the median national wage.
5. All our suppliers must also ensure that they do not rely on illegal immigrants or those trafficked by either gangmasters or work agencies charging potential employees for their services to operate in any part of their organisations, contractors, or subcontractors.
6. All suppliers are required, as part of their contractual relationship, to sign contracts that include undertakings as set out in S4 and S5 above.
7. The company takes steps through regular inspections of supplier operations to ensure that both product/service quality is maintained and S4 and S5 undertakings are fully met. Where any requirement is found not to be complied with the supplier shall be given eight weeks to rectify it. If not fully rectified then the supply contract will either be suspended, a contractually agreed penalty applied, or the contract will not be renewed at the date when the current contract comes to an end.
8. The company is especially attendant about S4 and S5 infringements in [countries] and [sectors]. Monitoring in these areas is therefore closer than in other parts of the supply chain.
9. All managerial and executive employees of the company are made fully aware of the company's policies in these fields and required to comply with them. The requirements are mainstreamed into as many in-house training activities as possible and is a mandatory subject to be covered during annual performance appraisal meetings for managers and executives.
10. If any manager or executive of the company in territories subject to the Modern Slavery Act (2015) is found to have 3 infringed the Act, encouraged its infringement, neglected to take its requirements seriously, or failed to take remedial steps when necessary then they shall be subject to disciplinary sanctions.
11. This statement is also published on the company's website at [www.cooperandturner.co.uk](http://www.cooperandturner.co.uk).

Signed this 23rd day of April 2021

A handwritten signature in black ink, appearing to read 'Anthony Brown', written over a horizontal dashed line.

Anthony Brown  
CEO