



## **Tennant Metallurgical Group Ltd**

Dunston Innovation Centre, Dunston Road

Chesterfield, S41 8NG

Tel: +44 (0) 1246 290600

Web: [www.tenmet.co.uk](http://www.tenmet.co.uk)

*For Signature and Return*

### **Tennant Metallurgical Group Ltd (the “Company”)**

#### **Modern Slavery 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.

We are 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 slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2021.**

##### **Organisational structure**

This statement covers the activities of all the companies in the group headed by Tennant Metallurgical Group Holdings Ltd a company registered in England and Wales. This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, officers, agency workers, agents, contractors external consultants and business partners.

##### **Our supply chains**

We are committed to ensuring that there is an approach, consistent with our obligations under the Modern Slavery Act 2015, to tackling modern slavery throughout our supply chains. We expect the same high standards from all our suppliers, contractors and other business partners, and as part of our contracting processes, we include reference to the aforementioned Act in prohibiting forced compulsory labour or slavery, whether adults or children.

##### **Our policies on slavery and human trafficking**

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

##### **Responsibility for the policy**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them, understand and comply with the policy and are given adequate training on it and the issue of modern slavery in supply chains.

The Financial Director has primary day to day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal controls and procedures in connection with the policy.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

**Compliance with the policy**

All employees receive a copy of this statement and it is returned signed when read and understood. In addition, presentations are made to all staff members to communicate the importance of abiding by the policy.

You must notify the Board of Directors or their line manager as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.

This is to be done without fear any unfavourable treatment for raising a concern, even if this concern turns out to be mistaken. No reports were received from employees, service providers, suppliers, or any enforcement agencies during the year to indicate any such breaches have occurred in connection with the company’s activities.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The policy is communicated through the company’s website or sent directly to the relevant persons in the supply chain.

Reference to the Modern Slavery Act 2015 is included in the company’s Terms & Conditions.

Due diligence and risk assessments are carried out, where appropriate, on external suppliers.

This statement was approved by the board of directors at a board meeting dated today.



**Liam Britton**  
**Financial Director**  
**19 June 2024**

**In signing below I confirm I understand and will adhere to the above policy:**

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**SIGNATURE OF EMPLOYEE**

**TENNANT METALLURGICAL GROUP LTD**

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**DATE**