

# Modern Slavery Statement 2020/21

## Introduction

Modern slavery is a crime. It is a way of maximising profits by producing goods and services through exploiting individuals. Modern slavery can include forced labour, human trafficking, and child labour.

The government requires certain organisations to state how they will act to ensure that modern slavery does not take place within their own business and within their supply chain. It also encourages smaller businesses to voluntarily produce a statement.

The requirements upon organisations are set out in section 54 of the Modern Slavery Act 2015.

## Our Business

Formed in 1993 and based in Staffordshire, SPM is a highly successful independent steel processing business, providing our core markets of automotive and construction with a bespoke service, focused on quality and reliability.

Our supply chain includes providers of raw steel (sourced mainly from major European or International businesses), which we then process into a form more readily used by our customers. Subcontractor services include transport, machine maintenance and infrastructure support, health and safety, employment agencies, and HR.

## Statement

SPM is opposed to all forms of modern slavery and is working with our employees and suppliers to ensure that it does not take place within our business, or within our supply chain.

## Our Values

SPM is managed on the basis of traditional family values and open and honest communication. We have a loyal workforce and our success has enabled us to invest in our production facilities, creating job opportunities for the local community. Our accreditation to the ISO standards reflects our commitment to quality, health and safety, and protecting the environment around us.

SPM complies with all applicable legislation. In addition, we have comprehensive Company policies and procedures which are applied consistently and which include:

- Employment policies and procedures
- Clear processes for raising concerns
- Responsible procurement

## People Policies

- Our Company policies, employment contracts and employee handbook set out how employees can expect to be treated by SPM, and what they should do if they want to raise concerns
- Our Company policies, employment contracts and employee handbook set out the expectations that we have with regard to employee behaviour including honesty, professional conduct, and regard for others. They make clear the consequences of failing to behave in the proper manner
- SPM has formal recruitment processes, and induction processes and checks, to satisfy ourselves that those that we employ are genuine, have the right to work in the UK, and can be trusted to behave ethically, in line with our stated principles and policies
- The induction process includes the issue and discussion of all Company policies, including the Modern Slavery Statement, to ensure that employees understand fully their obligations, and those of SPM
- The HR and Payroll processes ensure that SPM complies with all minimum wage and other employment requirements
- Employees understand that they are free to go home from the business at the end of their working day which may or may not include any overtime that they have voluntarily agreed to undertake

## The SPM supply chain

- Our Anti-bribery policy sets out how we will behave in order to maintain our reputation as an ethical business. We do not operate in an overseas market where bribery and corruption (and potentially modern slavery) is prevalent. However, we are mindful that potential corruption and modern slavery can take place “closer to home”
- SPM conducts its procurement processes in a proper, open and diligent manner, ensuring that we engage only with ethical organisations
- SPM has gone through a process to establish that our main suppliers either:
  - Have a statement which complies with the Modern Slavery ActOr
  - Have business ethics policies which include references to the prevention of modern slavery
- If a supplier is identified as having neither a Modern Slavery Statement nor business ethics policies which refer to Modern Slavery, they will be identified as “high risk”. In such cases, suppliers will be asked to provide details of how they address the risk of Modern Slavery within their business and supply chains

- SPM will regularly review its supplier list to ensure that new entrants, or any suppliers which move into a what is deemed to be a “high risk” category have an appropriate statement regarding Modern Slavery

### Employee Awareness and Training

- Employees have been informed about SPM’s obligations regarding, and commitment to avoiding, Modern Day Slavery within our business and supply chain
- New staff are introduced to SPM’s policies, including the Modern Slavery Statement and its associated policies, at their induction

### Associated Policies and Procedures

The following SPM policies and procedures are relevant to our Modern Slavery Statement:

- Whistleblowing Policy
- Anti-bribery Policy
- Equality and Diversity (employee handbook)
- Grievance Procedure
- Bullying and Harassment

### Complying with the Statement

All employees are expected to comply with the Company’s policies and behavioural expectations. Failure to do so will lead to a failed probationary period (for employees within their first three months of employment) or (for established employees) will be dealt with under the Disciplinary Procedure.

Under the Company’s Whistleblowing policy, employees are informed how to “sound the alarm” if they think that a crime related to Modern Slavery may be taking place.

### Keeping the Statement Up-to-Date

SPM will review this statement annually and update it as necessary. For example, if there is a change with regard to our potential exposure to modern slavery by entering new markets.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31/5/24.**

This statement was approved by the Directors on 1-6-23

Kevin Haynes  
**Managing Director**  
Date: