

Modern Slavery Statement

Our commitment

This statement is published in accordance with section 54 (Transparency in Supply Chains) of the UK Modern Slavery Act 2015.

Calder Industrial Materials Ltd is committed to conducting business in a manner which fully respects human rights and the dignity and freedom of individuals. We acknowledge and agree with our responsibilities as defined in the Modern Slavery Act and will not tolerate any conduct that contributes to, or encourages or facilitates, human trafficking, servitude, forced labour or child labour.

This statement sets out the steps we are taking to ensure modern slavery is not taking place in our business or our supply chain.

Our organisation

Calder Industrial Materials Ltd is a leading supplier of lead sheet and specialist lead engineering products to the roofing, healthcare, aerospace, defense, industrial, marine, oil & gas and research markets. The manufacturing of our products takes place in two factories on the same site in Chester, UK. Our supply chain includes suppliers of lead ingots, as well as suppliers of transportation, energy, and employment agency services.

We are a member of Calder Group; Europe's largest producer of lead sheet and lead-based engineered products with operating subsidiaries in Germany, France, Netherlands, Ireland and the UK.

Policies and procedures

We have a range of policies which can support meeting our responsibilities defined in the Modern Slavery Act. The most directly relevant of these is our recruitment policy and its associated procedures.

Other areas where our policies and procedures can support our Modern Slavery commitment include pay, payroll, Health & Safety, training & development, and communications & engagement.

We will undertake an annual review of our approach to preventing Modern Slavery.

Risk assessment

We have assessed the risks to our prevention of Modern Slavery according to their impact and likelihood of occurrence. The highest risk areas have been assessed as:

- Recruitment of full-time employees
- Our use of occasional agency staff
- The use of suppliers of lead and transportation services.



Due diligence

Our recruitment process includes checks for eligibility to work in the UK, and identification checks including sight of employee's passports. We conduct an occupational health check on all new employees, and their induction includes a full health and safety briefing. The Company Handbook, used for induction of new employees and reinforced through their time of employment, makes clear reference to Modern Slavery issues and our policy that no child or forced labour exists within our company or our suppliers.

Our payroll processes pay directly into a bank account which is clearly in the name of the employee.

We recruit temporary employees through local agencies which are well known to us, have been evaluated for their policy and have made clear statements and commitments on Modern Slavery.

We check that our main suppliers have made statements on Modern Slavery which are compliant with the requirements of the Modern Slavery Act and UK Government guidance.

Key performance indicators

We know the steps we are taking to prevent Modern Slavery are being effectively implemented if internal auditing reveals:

- All recruitment is fully compliant with our policies and procedures
- All employees are paid to bank accounts clearly in the name of the employee
- Audit of our main suppliers confirms the existence of a Modern Slavery statement compliant with the requirements laid out in UK Government guidance
- No reports are received from employees, the public or law enforcement agencies that would indicate any Modern Slavery occurrences in our business, or causes for concern
- We continue to improve our Modern Slavery practices by delivering the 'further steps' outlined in our annual review and annual Modern Slavery statement.

Further steps over the next year

Going forward we will continue to monitor and where necessary strengthen our Modern Slavery policies and procedures. Over the next year we intend to:

- Risk-assess new and smaller suppliers for commitments to prevent Modern Slavery
- Increase Modern Slavery communications and training where necessary.

Board approval of this statement

This statement was approved by the Board of Directors of Calder Industrial Materials Ltd on 20 April 2021.

Simon Vasey - Managing Director

21 April 2021.