

Introduction: MSL & DASL Modern Slavery Act 2015 Policy

Although both Metalwork Solutions Limited (MSL) and Direct Assembly Solutions Limited (DASL) fall outside the scope for compliance with the above Act, namely to publish a slavery and human trafficking statement each financial year, we do fully believe in and support the aims of this legislation and therefore also fully support our customers in helping them to prove their own compliance for monitoring and controlling operations. We therefore detail below our approach to business, risk areas in our supply chain, and steps we are taking to mitigate risks.

Structure of our Business and Supply Chain Organisation

- Our manufacturing business units are located on one site, in the UK, under the control of our Director
- Our immediate supply chain is primarily based in the UK, and consists of a mix of companies who sit both inside and outside of the reporting scope of the act
- We do not directly import any materials from a manufacturer based outside the UK
- We do use materials imported from all areas outside of the UK which are procured, imported and supplied to us by 3rd parties
- We annually review our supplier base to check & update the above statements

Structure of our Recruitment & Employment

- We have an equal opportunities policy in place
- We will ensure that no job applicant or employee receives less favourable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion, or is disadvantaged by conditions or requirements that cannot be shown to be justifiable
- We prefer to employ our people directly, rather than utilising agency staff
- As a minimum we always aim to pay our employees the UK living wage
- We often and more normally pay our employees a wage commensurate with competency and performance
- We treat our apprentice roles in the same way we treat other staff members
- When utilising agency staff, we only select from creditable suppliers with a strong track record of UK supply

Supply Chain Due Diligence

- We do not currently directly audit our supply chain with supplier questionnaires regarding the Act
- We do review our supply chain with particular focus on suppliers who we are aware fall within the compliance scope of the act
- Our reviews take the form of visiting the specific suppliers' website to review their policy and annual statement regarding the Act and to ensure they are not declaring to have "Taken no steps".
- We do review our supply chain with particular focus on suppliers who we are aware fall outside the compliance scope of the act but may be procuring from regions particularly vulnerable to activities that the Act aims to control, reduce and eliminate. We aim to ask these suppliers to confirm the steps they have taken to achieve the aims of the act.
- We will increase our activities within our supply chain as resources permit or if legislative scope changes

Employment Due Diligence

- Our personnel recruitment policy includes all identity checks to prove eligibility to work detailed by HMRC
- We request eligibility checks from any Agency supplying temporary staff
- Through 360' checking we ensure any Agency temporary staff are paid, at least, the minimum wage

Training

- Our Employees have been made aware of the Act, its aims, and our activities to ensure compliance.
- We strive to keep ourselves aware of the Act and any changes we need to make to further ensure compliance

Customer requests for proof of compliance

- MSL & DASL will complete customer questionnaires to the best of our ability and knowledge
- Our customers are welcome to download and include this Policy Statement as part of their compliance pack

Our understanding of the Act and our compliance obligations

- <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- <https://www.gov.uk/government/collections/modern-slavery-bill>
- A commercial organisation is required to comply with the reporting requirements if:
 - it is incorporated or a partnership
 - it "carries on a business, or part of a business" in the UK
 - its turnover or the turnover of a parent company and its subsidiaries is equal to or greater than £36 million per annum
 - it supplies goods or services

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