

Sheffield Forgemasters International Limited

Slavery and Human Trafficking Statement

Pursuant to section 54 of the Modern Slavery Act 2015, this slavery and human trafficking statement for the financial year ending 31 December 2019 is given by Sheffield Forgemasters International Limited on behalf of itself and its subsidiary companies Sheffield Forgemasters Engineering Limited, Sheffield Forgemasters Steel Limited, Vulcan SFM Limited, Sheffield Forgemasters RD26 Limited, Steel Propeller Limited and Sheffield Forgemasters Share Trustees Limited (together the “Sheffield Forgemasters Group” or “Group”).

Sheffield Forgemasters’ Business Activities and Supply Chain

Sheffield Forgemasters Group is a global leader in supplying casting and forging solutions for the World’s most complex engineering challenges, supplying markets including Defence, Civil Nuclear, Oil & Gas, Petrochemicals, Power Generation and Steel Processing.

Further details of the Group and its operations can be found at <https://www.sheffieldforgemasters.com/>.

The Group’s supply chain consists largely of UK-based corporate entities, with a small number of non-UK suppliers. The supply chain includes scrap metal suppliers, suppliers of engineering and mechanical services, environmental and recycling suppliers as well as transportation and logistics suppliers. The Group has a low reliance on temporary labour.

No slavery or human trafficking or any employment practices of this nature occur within the Group’s own operations. The Group also considers the risk of such behaviour occurring in its supply chain to be relatively low. Nonetheless the Group has put in place appropriate policies and procedures to seek to prevent slavery and human trafficking taking place in its own business or in its supply chains.

Sheffield Forgemasters’ Policies and Supplier Principles

One of the core values of the Sheffield Forgemasters Group is a commitment to acting legally, morally and ethically in all of its business dealings. In line with these values, the Group has a zero tolerance approach to slavery and human trafficking.

The Group has issued a Modern Slavery Policy which confirms that the prevention, detection and reporting of illegal working practices, such as slavery and human trafficking, in its business or in its supply chain is the responsibility of all of those working for the Group. This policy has been notified to all relevant staff within the Group and is available to view within the Group’s document library.

Employees are also encouraged to raise any concerns which they may have in respect of slavery issues via the Protective Disclosure Policy and it is enshrined in both of these policies that no-one will suffer any detrimental treatment for raising any concerns in good faith. No concerns have been reported.

In addition, the Group has developed a Supplier Principles document which sets out the legal and ethical standards the Group expects from its suppliers and their supply chain and which makes it mandatory for suppliers to comply with the requirements of the Modern Slavery Act. The Group intends to assess new and existing suppliers using the Supplier Principles as part of its due diligence process and suppliers will be expected to comply with all aspects of the Principles.

Due Diligence Processes

As part of its ongoing due diligence processes, and to seek to detect any instances of slavery or human trafficking in its supply chain, the Group has undertaken a review of its regular suppliers so as to identify:

1. Major suppliers (by reference to the level of business undertaken with such suppliers).
2. 'Higher Risk' suppliers (by virtue of the activities which they undertake or their geographical location being considered as high risk under the Global Slavery Index).

The Group has undertaken the following due diligence exercises so as to evaluate the risk of slavery or human trafficking being undertaken by any of these major and higher risk suppliers:

- Utilising Worldcheck, a leading database used by various public and private bodies for due diligence purposes, searches were undertaken for any reports or information linking such suppliers to issues of corruption or employment practices, such as slavery and human trafficking or forced labour, which are contrary to the values of the Group.
- A copy of the Group's Modern Slavery Policy was sent to each of these suppliers, with confirmation requested that the supplier understood such policy and will act in compliance with it. Suppliers who do not engage on these issues have been informed that the Group will not do business with them unless it is satisfied that they do not engage in slavery or human trafficking.
- A detailed due diligence questionnaire on employment practices was sent to such suppliers and the responses to such questionnaire evaluated. Where such responses were not satisfactory, suppliers were asked to provide further information or were informed of the measures the Group expects them to have in place to seek to prevent slavery and human trafficking.

From the information obtained and responses received to date no evidence of slavery or human trafficking has been identified and the Group considers that these suppliers have appropriate policies and safeguards in place to prevent such activities.

The Sheffield Forgemasters Group's On-going Commitment

The Group will continually review and improve its processes so as to seek to ensure that slavery and human trafficking does not occur within its business or within its supply chain.

The Group will notify staff and suppliers of the Modern Slavery policy periodically so as to maintain awareness of these important issues and it will immediately cease to trade with any supplier or third party who engages in slavery, human trafficking or any other business practices which are contrary to the Group's Supplier Principles and wider values.

This statement has been approved by the Board of Directors of Sheffield Forgemasters International Limited on behalf of the Sheffield Forgemasters Group on 24th November 2020

Signed 

David Bond, Chief Executive Officer

Sheffield Forgemasters International Limited

Date: 30 November 2020