

METLAB Supplies Limited

Modern Slavery Policy: Our Approach to Ethical Trading and the Prevention of Unacceptable Practices

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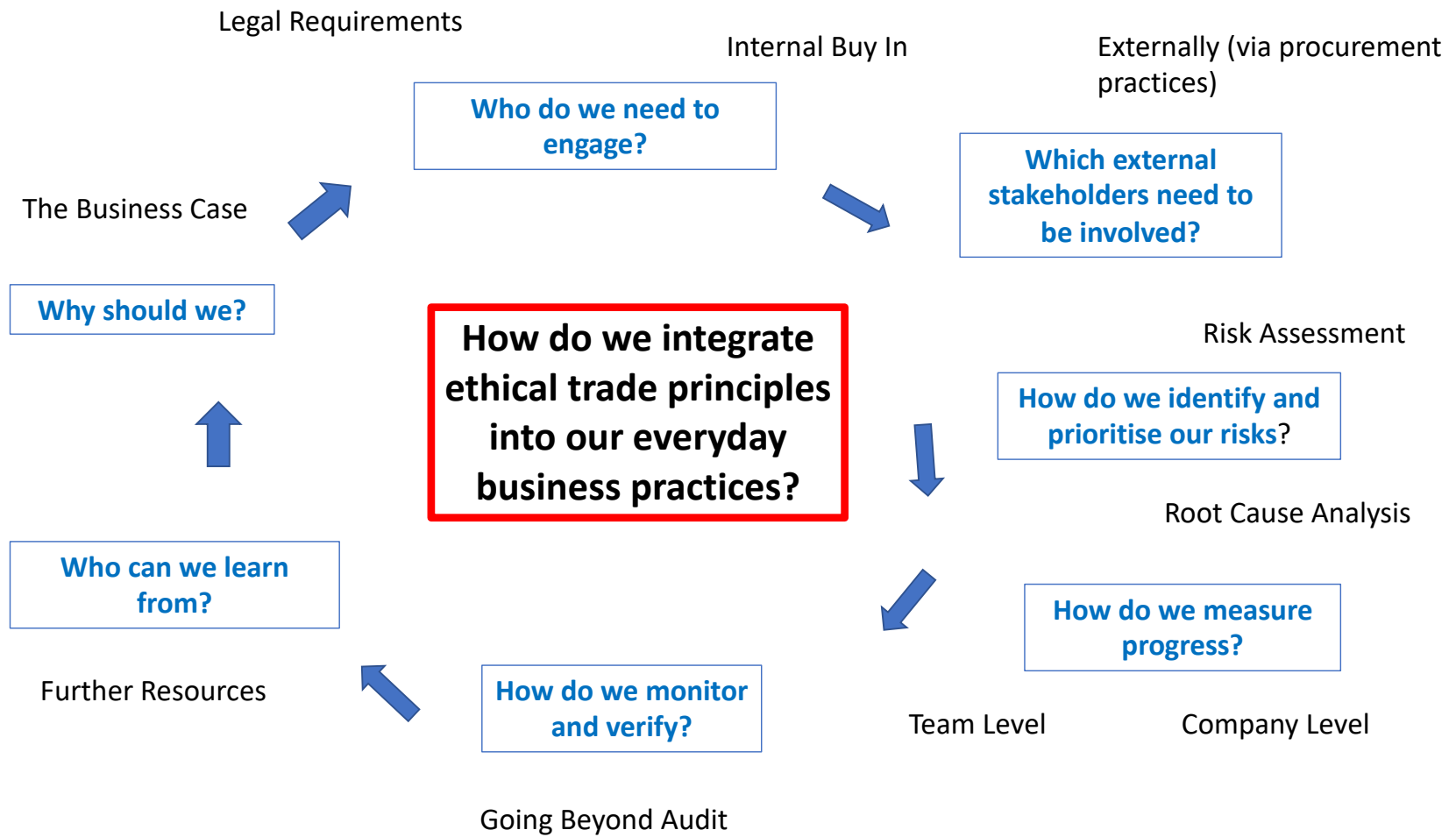
1 Introduction

1.1 This policy statement complements our Corporate Social Responsibility Policy by addressing the ethical trading element of our approach in more detail. As a small business, it could be argued that METLAB's influence over the operation major national and international businesses is limited. However, this should not stop us from endeavouring to work with like-minded suppliers and customers. While we might not be able to directly control what happens in the wider business environment, we can exert more deft and subtle influence on the policies and practices of suppliers, customers and competitors; and we can and do exercise choice over which of those businesses we work with.

1.2 In practice, this means having robust and transparent procurement processes in place. Using our extensive and detailed knowledge of the business sector we work in to work with like-minded businesses who share our desire to achieve the highest ethical and legal standards. Furthermore, we can clearly control our own business strategies, policies and approach ensuring the values and standards we apply to our own business operations meet legal and ethical standards.

1.3 We have drawn on the Ethical Trading Initiative – Integrating Ethical Trade Principles into Core Business Practices Toolkit in helping to create and develop our approach. We still have much to do, but this framework helps to focus our attention on integrating best practice into our day-to-day business operations.

1.4 We confirm our intention to comply with all relevant legislation in the UK including any legislation devolved to administrations in Wales and Scotland. For example, compliance with the Human Trafficking and Exploitation (Scotland) Act 2015 when conducting operations in Scotland.



2 Anti-Slavery and Tackling Human Trafficking

2.1 METLAB has developed sound recruitment practices to ensure all the correct checks and balances are in place to employ people who are legally entitled to work in the UK and who have not been subjected to coercion or any other form of illegal practice whilst seeking legitimate work.

2.2 Our procurement policy and practice referred to above means that we have safeguards in place to work with businesses that share our approach. However, if any information subsequently came to light which cast doubt on the legal or ethical approach adopted by anyone in the supply chain or indeed where they have been convicted for failings, we would curtail our association with them immediately.

2.3 Therefore, in this respect we are strongly opposed to all form of modern slavery and exploitation of vulnerable people both in terms of our own policy and practice and that adopted by businesses we work with throughout the supply chain. We also intend to be proactive in challenging poor practice we observe in our supply chains and across our wider dealing with partners and stakeholders.

3 Criminal Finances Act 2017 – Prevention of Tax Evasion

3.1 This legislation, together with a raft of additional anti-corruption and bribery legislation which has been promulgated in the UK, seeks to ensure that individuals and businesses operate within a clearly defined and strict framework to operate both ethically and legally. The legislation provided enforcement agencies and partners with further capabilities and powers to recover proceeds of crime, tackle money laundering, tax evasion and corruption as well as combating the financing of terrorism. METLAB does not and would not work with any business in the supply chain who had been found guilty of any practices under this or other legislation involving financial impropriety or illegal practice.

3.2 We are confident about our own levels of compliance and work within this strict ethical and legal framework because as with our approach in Section 2 above we are in control of what we do as a business. This also means that we would not bow to pressure from others to act in any way which did not concur with our legal and ethical obligations. Whilst we acknowledge that our direct influence across suppliers and customers we work with is more limited we can still do something. For example, by having a robust framework in place and using our knowledge and intelligence of the markets in which we operate, we believe we can influence others by our refusal to work with anyone who does not operate to the highest ethical and legal standards that we do.

3.3 Our approach means that if we identified illegal practice which resulted on direct or indirect attempts to evade tax, engage in bribery and other forms of corruption we would report this to the relevant authorities without a moment's hesitation.

3.4 As a responsible employer, our pay policies and practice reflect national requirements to meet minimum wage standards, but we employ a range of semi-skilled workers to reflect the quality of work we undertake to deliver excellent products and services to our customers. This helps to ensure our approach goes beyond compliance with minimum legal standards as we expect to do what is right both legally and ethically. We expect our suppliers to do the same and work hard to ensure that, as far as possible, we only work with like-minded businesses.

4 Anti-Bribery Legislation – The Bribery Act 2010

4.1 The Act is concerned with bribery. Very generally, this is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could cover seeking to influence a decision-maker by giving extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process.

4.2 The legislation says that organisations could be liable if a very senior person in the organisation (for example, a managing director) commits a bribery offence. This person's activities would then be attributed to the organisation.

4.3 Organisations could also be liable where someone who performs services for it – like an employee or agent – pays a bribe specifically to get business, keep business, or gain a business advantage for your organisation. Therefore, to provide confidence about our compliance with this important legislation we have developed the following processes to prevent bribery in the markets we operate in.

4.4 We have adopted the following six principles will help us decide what, if anything, we need to do differently:

1 Proportionality: Any action we take is proportionate to the risks we face and to the size of our business. We are a small business in terms of employees but provide a diverse range of products and services to our customers. We have a system for assessing suppliers and are therefore careful to only work with customers and suppliers who share the same level of commitments to operating fairly and legally.

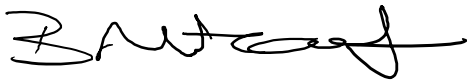
2 Top Level Commitment: Directors are fully committed to ensuring the company conducts business in full compliance with all legislation including bribery. Our staff understand that you do not tolerate bribery. We have delivered in-house training to outline what it means to trade ethically and continue to remind our teams that we are committed to legal and honest trading.

3 Risk Assessment: We think about the bribery risks we might face and take steps to minimise them. For example, we research into the markets we operate in and the people we deal with, especially if you are entering into new business arrangements and new markets overseas. Our quality management processes help in this regard which include steps to assess the bona fides of suppliers we intend to work with

4 Due Diligence: Knowing exactly who we are dealing with can help to protect our business from taking on people who might be less than trustworthy. Our recruitment processes and have safeguards in place to minimise the risk of employing people who share our values and commitment to ethical trading.

5 Communication: As referenced above we have briefed out staff about our policies and procedures. This improves awareness and helps to deter bribery by making clear the basis on which we do business. We review our communication processes regularly to demonstrate our ongoing commitment to ethical trading.

6 Monitoring and Review: We recognise that the risks we face, and the effectiveness of our procedures may change over time. We have formal management review processes in place to ensure the anti-bribery steps we have taken remain effective so that they keep pace with any changes in the bribery risks we face when, for example, we enter new markets.



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