

# STATEMENT FOR THE FINANCIAL YEAR 2018

## *Modern Slavery and Human Trafficking*

31st March 2019

### INTRODUCTION

This statement is made on behalf of Carlisle Fluid Technologies UK Ltd pursuant to the section 54(1) of the Modern Slavery Action 2015 and comprises our slavery and human trafficking statement.

### OUR BUSINESS

A UK private limited company, manufacturing own equipment for finishing applications worldwide with ultimate parent undertaking and controlling party by Carlisle Companies Inc USA.

### OUR SUPPLY CHAINS

Our supply chains include:

External offshore and onshore companies providing a combination of material products and services, this also includes material supplies from within the Carlisle Fluid Technologies own division.



### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and in our supply chains.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we are reviewing our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

This includes:

- Supply chain risk mapping against the Global Slavery Index.
- Enhanced onboarding of new suppliers.
- Enhanced vendor Terms & Conditions.
- Vendor declarations of compliance with our T's & C's
- Establishment of an audit and compliance team.

### RISK ASSESSMENT AND MANAGEMENT

The risk evaluation of suppliers will utilise a combination of factors that are intended to identify and initiate actions that are commensurate with their findings. In the event that a supplier is unwilling to support this policy in meeting the required standards, Carlisle Fluid Technologies reserves the right to cancel existing contracts. Assessments will be reviewed periodically for their accuracy.

## **KEY PERFORMANCE INDICATOR'S**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Risk assessment of all new vendors.
- Assessment of all existing high-risk suppliers at Tier 1 level
- Training of all site Leadership Team and Purchasing personnel in Modern Slavery Requirements and company Procedures.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our Leadership team and Purchasing personnel. We will require our business partners to provide training to their staff and suppliers and providers.

## **RECRUITMENT AND SELECTION**

The Company uses only specified, reputable employment agencies to source labour. All entities in the business ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

The Company and its associated subsidiaries do not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

## **WHISTLEBLOWING**

The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline.

Public Concern at Work Tel.0207 404 6609

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes CFT's slavery and human trafficking statement for the financial year ending 1st April 2019 and was approved by the Executive

leadership Team xxth March 2019.

A handwritten signature in black ink, appearing to read 'Alex Norris', with a long horizontal flourish extending to the right.

Alex Norris  
Bournemouth Site Leader