

Full name: Modern Slavery Act 2015: slavery and human trafficking statement.

## **INTRODUCTION FROM THE CEO**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Low & Bonar continues in its commitment to act ethically and with integrity in all our business dealings and relationships. We recognise the business benefits that diversity and equal opportunity bring and do not tolerate human rights abuses in our own operations. We also recognise our role as customer in communicating our expectations to our suppliers and working with them, where necessary, to improve their own processes. We are developing and enforcing proportionate, risk-based systems and controls designed to that ensure modern slavery is not taking place in our own business or in our supply chains with our knowledge.

We are committed to improving our practices to combat slavery and human trafficking so that this statement will show year-on-year development in our management of these issues.

## **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 own business or in supply chains with our knowledge, and working to eliminate it if it is found. Responsibility for this policy sits with the Executive Leadership Team and management at all levels are responsible for compliance with it.

## **ORGANISATIONAL STRUCTURE**

We are an international business-to-business performance materials group. We design and manufacture components which add value to, and improve the performance of, our customers' products by engineering a wide range of polymers using our own technologies to create yarns, fibres, industrial and coated fabrics and composite materials. We sell globally and manufacture in Europe, North America, the Middle East and China.

Low & Bonar PLC is the ultimate parent company of the Low & Bonar Group and has its head office in the United Kingdom. The Group has over 2,000 employees worldwide and operates in around 20 countries. Our principal trading companies include Low & Bonar GmbH, Low & Bonar NV and Low & Bonar BV and this statement is made by and on behalf of Low & Bonar PLC and those principal trading companies. As an integrated business, we expect all parts of the Low & Bonar Group to abide by our policies on modern slavery and this statement describes our efforts as a group as a whole to combat it.

The Group had a global turnover of approximately £400m in the year to 30 November 2016.

## **OUR BUSINESS**

Our business is diverse and we serve many customers in many markets. We are organised into four key global business units:

**Building & Industrial:** a range of technical textile solutions for niche applications in the building, roofing, air and water filtration and agricultural markets.

**Civil Engineering:** Woven and non-woven geotextiles and construction fibres used in major infrastructure projects, including road and rail building, land reclamation and coastal defence.

**Coated Technical Textiles:** A range of technical coated fabrics providing aesthetics and design, performance and protection in products such as tensioned architectural structures, awnings, marquees, advertising banners, tarpaulins and vehicle curtain sides to the transport, building products, print, leisure and industrial markets.

**Interiors & Transportation:** Technical fabrics used in transportation, interior carpeting, resilient tiles and decorative products.

These global business units are supported by centrally-managed Group Functions including Manufacturing and Operations, Human Resources, Finance, IT, Legal, Procurement and Innovation.

This structure allows central oversight of our operations and the adoption of minimum standards of operation, supplemented with frequent site visits from senior staff. We also encourage employees at all levels to raise any concerns they may have using confidential whistleblowing hotlines.

## **OUR SUPPLY CHAINS**

Our manufacturing processes begin with the sourcing of widely-available polymers, including polypropylene, polyethylene, polyester and nylon, together with speciality additives and colours. Our proprietary technologies then produce a range of yarns, fabrics and coated and composite high performance materials, tailored to our customers' requirements.

In the year to 30 November 2016, we spent approximately €220m purchasing the key materials which make up our products. These materials were sourced from over 300 suppliers in 80 different categories. Our key suppliers are located across the globe, and we receive supplies from countries including Hungary, Saudi Arabia, Germany, the USA, France, the United Kingdom, the Netherlands, South Korea, China and Belgium. We also have over 3,000 suppliers of other indirect products and services to the group in over 70 categories of

supply. These supply chains service our 15 production sites in 10 countries and our other offices around the globe.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are proud to have adopted a specific anti-slavery policy for the first time during 2016.

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 proportionate, risk-based systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains with our knowledge and working to eliminate it where it is found.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we undertook a programme of due diligence in relation to our key suppliers during 2016. This focused on these key aspects:

- an assessment of risk from a “top down” perspective focusing on assessments of the prevalence of modern slavery in those countries in which our key suppliers operate and the existence and effectiveness of governmental responses to modern slavery in those territories using the Global Slavery Index 2014 produced by the Walk Free Foundation<sup>1</sup>; and
- undertaking a survey of our key suppliers’ individual policies and practices on these matters.

Our analysis to date leads us to believe that we are operating in a relatively low-risk environment in relation to modern slavery in our supply chains – our suppliers are based in countries with low incidence of modern slavery; and governmental response to slavery in those countries is amongst the more robust. Our particular suppliers have corporate governance policies which would lead us to expect that they would support our policy with regard to modern slavery. However, we recognise that our due diligence efforts are not complete and that we cannot afford to be complacent and assume that it is safe to continue with “business as usual”.

We have also begun:

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<sup>1</sup> The Walk Free Foundation (<http://www.globalslaveryindex.org/walk-free/>) identifies itself as a global organisation with a mission to end modern slavery in our generation by mobilising a global activist movement, generating the highest quality research, enlisting business and raising unprecedented levels of capital to drive change in those countries and industries bearing the greatest responsibility for modern slavery today. The Walk Free Foundation says that it will do this by: identifying countries and industries most responsible for modern slavery; identifying and implementing with partners the interventions in those countries and industries that will have the greatest impact on modern slavery; and critically assessing its impact.

- developing and implementing new standards for dealing with key suppliers, including adopting new provisions requiring, amongst other things, compliance with relevant laws relating to modern slavery;
- continuing due diligence into our own business, such as in relation to our labour policies and practices;
- developing training for relevant staff in the implementation our of new policies.

We believe that we have taken the first important steps to ensure that we have in place systems to:

- Set and publicise a policy specifically dealing with our attitude to modern slavery;
- Identify and assess potential risk areas in the key areas of our supply chains; and
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

We will be encouraging staff to report matters relevant to the policy and we maintain a whistleblowing hotline to permit this to happen in confidence, where necessary.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

To ensure all key players in our supply chains comply with our values we have started to initiate a supply chain programme which will:

- encompass specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude or, whilst we start to embed this policy, will see distribution of statements of our expectations in this regard;
- set an expectation that our suppliers will hold their own suppliers to the same standards; and
- where appropriate and practicable, see us give support to our suppliers as they address work practices in their own business and supply chains.

Our compliance team in relation to modern slavery issues consists of representatives from the following departments: Legal Affairs; Human Resources; Procurement; and Group Finance.

We have asked our Group General Counsel and Group Procurement Director to undertake overall responsibility for the day-to-day implementation of our policy, under the auspices of our Executive Leadership Team.

#### **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 will be providing training to relevant staff (responsible for site visits and visits to our suppliers).

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We have not set any specific key performance indicators to measure the effectiveness of our policy, but we will give consideration to this as our due diligence effort is rolled out and we develop a deeper understanding of how modern slavery affects our supply chain in practice.

### **FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken to date to ensure that we develop our understanding of slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking during the year ahead:

- to broaden and deepen our due diligence efforts, and this will include a supplier-specific survey of policies and practices relating to modern slavery, through use of a bespoke questionnaire;
- to extend our due diligence programme to include a greater proportion of our key suppliers;
- to establish our training programme for key staff;
- to begin to include anti-slavery provisions in our supply chain requirements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30 November 2016.