INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights.

We do not tolerate human rights abuses in our own operations. We also recognise our role as a 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 to our knowledge in our own business or in our supply chains.

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 risk-based systems and controls to ensure slavery and human trafficking is not taking place anywhere in our own business or in supply chains to 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 and China.

Low & Bonar Limited is the parent company of the Low & Bonar Group and has its head office in the United Kingdom. The Group has circa 1,600 employees worldwide and operates in around 18 countries. Our principal trading companies include Low & Bonar GmbH and Low & Bonar BV and this statement is made by and on behalf of Low & Bonar Limited 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 £317m in the year to 30 November 2019.

OUR BUSINESS

Our business is diverse and we serve many customers in many markets. We are now organised into two key businesses: the non-wovens business unit known as Colbond and the
Coated Technical Textiles unit, having disposed of our Civil Engineering business unit during 2019.

In previous years, we have supported global business units from centrally-managed Group functions including Integrated Supply Chain (Manufacturing and Operations), Human Resources, Finance, IT, Legal, Procurement and Innovation. During 2019, we have continued the changes to this structure begun in 2018, to have the businesses organised on a more stand-alone basis, with operational control for Colbond in particular arranged across its three principal regions of operation (EMEA, North America and Asia). However, we also maintain central oversight of minimum standards of operation and maintain a central Procurement function for Colbond. We 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 polyamide, 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 2019, we spent approximately €180m purchasing the key materials which make up our products. These materials were sourced from over 160 suppliers in 50 different categories. Our key suppliers are located across the globe, and we receive supplies from countries including Germany, the USA, France, the United Kingdom, the Netherlands, South Korea and China. We also have over 3,000 suppliers of other indirect products and services to the group in over 140 categories of supply. These supply chains service our 9 production sites in 5 countries and our other offices around the globe.

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

As part of our initiative to identify and mitigate human rights risk, in 2016 we initiated a programme of due diligence. This focused on the following 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 Foundation1; and

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1 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
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. However, we recognise that our due diligence efforts should continue. That remains our approach for the foreseeable future.

**SUPPLIER ADHERENCE TO OUR VALUES**

To ensure all key players in our supply chains comply with our values we have continued to implement measures in our supply chain programme which:

- encompass specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude;
- 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.

**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 make available resources to allow for training for relevant staff.

**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 continue to review this position as we develop a deeper understanding of how modern slavery affects our supply chain in practice.

**FURTHER STEPS**

At the date of this statement, the Low & Bonar group has recently been acquired by the Freudenberg group of companies and expects to review its policies and procedures in relation to combatting modern slavery as part of its integration into Freudenberg.
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 2019.

Matthew Joy
Director