



Modern Slavery Policy and Statement for Financial Year 2016/17

Purpose:

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Alderley plc has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Scope:

This statement has been approved by the Board of Directors of Alderley plc together with all of the subsidiary undertakings.

It applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency works, seconded works, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

Status:

This statement does not form part of any employee's contract of employment and we may amend it at any time.



Authorised	Group Chief Executive Officer On behalf of Alderley plc Board of Directors	
Owner	Group Head of HR	
Issue Date	28 March 2017	
Revision number	3	



Table of Contents

Purpose:	1
Scope:	1
Status:	1
1. Introduction from the Group Chief Executive	3
2. About Alderley	3
3. About Modern Slavery	3
4. Responsibilities	3
5. Our Related Policies.....	4
6. Our Suppliers	4
7. Training.....	4



1. Introduction from the Group Chief Executive

Alderley plc prides itself on setting high standards for sustainable and ethical business practices in its operations worldwide. Included in those high standards is a commitment to respecting and protecting the human rights of all individuals and preventing all forms of modern slavery or human trafficking in all parts of our business organisation, including our supply chain. We are continually developing and improving our business practices and policies in line with that commitment. We support a strong, collective stand to identify, prevent, and raise awareness of modern slavery and human trafficking practices in all parts of the world.

2. About Alderley

Alderley is a multi-disciplined engineering company operating in the oil, gas and petrochemical industries producing effective and efficient solutions for the metering, processing, treatment and control of hydrocarbon products. Alderley has a long heritage in the oil and gas industry and has supplied more than 750 systems to more than 50 countries. Alderley has headquarters in the UK, and regional facilities in the UAE, Kingdom of Saudi Arabia and Singapore.

3. About Modern Slavery

Modern slavery is a complex crime that takes a number of different forms. It encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. Victims may be sexually exploited, forced to work for little or no pay or forced to commit criminal activities against their will. Victims are often pressured into debt-bondage and are likely to be fearful of those who exploit them, who will often threaten and abuse victims and their families. All of these factors make it very difficult for victims to escape.

4. Responsibilities

Directors of Alderley plc

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.



You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

5. Our Related Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Group Health, Safety and Environmental Policy: we are committed to addressing health and safety issues in our everyday operations, and working to prevent slavery and human trafficking is a component of that process.
- Recruitment Policy. we operate a robust recruitment policy, including conducting eligibility to work checks for all employees. We seek to ensure that all recruitment is fair, transparent and compliant.
- Whistleblowing Policy. we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

6. Our Suppliers

Alderley operates a supplier policy and maintains a preferred supplier list. We will conduct due diligence on all new suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and adhoc audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

7. Training

To ensure a suitable understanding of the risks of modern slavery and human trafficking in our business and our supply chains, relevant directors and employees in our business will participate in workshops/training over the course of the financial year ending 30 September 2017.