



Modern Slavery Statement

Ref: Modern Slavery Act 2015

Modern slavery is an unquestionable and indefensible violation of an individual's basic human rights. Millennium Coatings Ltd recognises that as a commercial organisation it has a moral and social responsibility to ensure that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited and take a zero-tolerance approach to modern slavery in all forms including servitude, human trafficking, forced labour and bribery etc.

We are committed to preventing slavery and human trafficking in our business activities, to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

Organisation and Current Activity

Millennium Coatings Ltd was established in 1999 to provide electrostatic dry powder application, wet spraying, shot blasting, cold galvanising and pre treatment and preparation for the steelwork and other metal fabrication Industries

The company currently has under 15 employees and uses a small regular supplier base of about 20 for the procurement of materials, consumables and 2nd processes.

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

Whistle-blowing Policy

We operate a code of business conduct and a whistle-blowing 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.

The company encourages all our employees, customers and other business partners to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature.

Supply Chain Management

The Company operates a supplier control process and maintains a preferred supplier list.

We conduct due diligence on all 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 offenses relating to modern slavery and on-site visits if required, visits as appropriate and an annual appraisal based on service, quality and delivery.

The company does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour and as a general rule are not likely to be susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level, consequently, employees responsible for managing suppliers are, themselves, responsible for ensuring that our values and ideals are upheld. This continues to be a work in progress and we are strengthening our controls as new suppliers are developed. For example, serious violations by suppliers will lead to the termination of the business relationship.



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Training

The Company has made all employees working in supply chain management aware of the risks and to look for any signs of slavery and human trafficking and what should be done if this activity is suspected. Awareness training is provided for all main board members and entity directors and any other staff in relevant

Recruitment and Selection

As required, the Company operates a robust recruitment policy, including the use of reputable employment agencies to source labour and to ensure appropriate controls are in place and conducting the use of eligibility checks of right-to-work documents, visas and passports etc for employees to safeguard against human trafficking or individuals being forced to work against their will.

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 whistle-blowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

Our performance indicators

No reports have historically been received from employees, the public, or law enforcement agencies to indicate that any modern slavery practices have been identified and the effectiveness of the current processes in place can be monitored through the non-conformance process where any issues are recorded, investigated and appropriate actions taken.

Signed:

Simon Nightingale (CEO)

Date: 30th November 2018

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