



## Modern Slavery Policy

TBC has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We expect the same high standards from all of our contractors, suppliers and other business partners. We expect them to adopt the same zero tolerance approach to the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

### Organisation's Structure

We are a Limited Company supplying industrial fasteners to the engineering, recycling and construction sectors. The business consists of circa 12 employees who are directly employed by The Bolt Company.

### Our Supply Chains

Our supply chains include in the region of 300 suppliers, with around 50 of these suppliers accounting for 80% of our expenditure on a regular basis. Our direct suppliers are predominantly UK or EU based and support our business in the provision of materials, equipment and professional services. We have no reason for concern in relation to any current member of the supply chain and their compliance with the Modern Slavery Act 2015.

### Our Policies on Slavery and Human Trafficking

We are committed to ensuring as much as is reasonably practicable 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 supply chains.

TBC take the responsibility for conducting and growing our business in a sustainable and responsible manner. We understand the impact our activities can have on the environment and society and endeavour to ensure we eliminate or mitigate the risk of negative impacts. We have committed to incorporating sustainability into our business strategy and adopting sustainable decision making as an integral part of the way we do business. To that end, we adopted policy statements in relation to sustainability, sustainable procurement and corporate social responsibility,

### Anti-Slavery Policy

Our Anti-Slavery Policy sets out our approach to modern slavery and applies to everyone working directly or indirectly for or with us. We recognise that appropriate training on modern slavery and the use of forced, compulsory or trafficked labour will increase awareness among our people as well as mitigating the risk within the business and the supply chain.

### Training and Education

During the year ahead 2022 our Code of Conduct will be rolled out throughout the business as an e learning tool. This training will also form part of our induction process for all new starters and will be compulsory training requirement for existing employees. The training explains what modern slavery is and informs our people that it is their responsibility to help prevent, detect and report incidences of modern slavery. It advises our people to raise concerns about incidences of modern slavery through management or confidentially.

TBC's approach to the prevention of modern slavery has all stakeholder buy in from the highest levels of management within our organisation. The policy has been considered and formally ratified by the senior management

### Compliance

TBC believe that **Modern Slavery Compliance** is an integral part of our supplier network. As part of the approval process we have undertaken to work with our suppliers to ensure that they understand and support the philosophy of eliminating Modern Slavery. To this end we have undertaken a business improvement process to formal communicate with each supplier to furnish us with a copy of their modern slavery policy. Where the suppliers engage we will request that they make the same commitment agrees we will publish their policy along with this policy on our website.

We have an accepted approach for suppliers who breach the Modern Slavery Act and this is to be communicated to our supply chain and business partners.

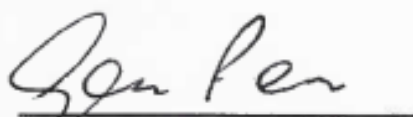
We have identified a dedicated person, the Compliance Officer, to deal with concerns about compliance with the Act and protections in place for anyone who brings matters of concern to our attention.

We are satisfied that we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- Our effectiveness in combating slavery and human trafficking

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and applies to Premier Fasteners Trading as The Bolt Company. This constitutes our slavery and human trafficking statement for the financial year ending 31st December 2022, and outlines the steps we are taking to assess our operations, supply chain and mitigate any risk of slavery and human trafficking.



  
Glenn Power  
Managing Director  
11<sup>th</sup> January 2022