

## STATEMENT ON MODERN SLAVERY

### Introduction

Bulten Ltd, and Bulten Group as parent company, are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's slavery and human trafficking statement for the financial year ending 31 March 2019.

### Organisational Structure and Business

Bulten Ltd is part of the Bulten Group and our parent company is Bulten Fasteners AB based in Gothenburg, Sweden.

Bulten Ltd imports and exports fasteners for the automotive industry. Bulten introduced its Code of conduct for suppliers in 2017. The code is specially designed for suppliers, the aim being to communicate more clearly our demands when it comes to business ethics, health and safety, environmental requirements, social responsibility, and this statement. Implementation has begun with communication and distribution to all active suppliers, and the aim is to achieve acceptance from all suppliers.

To ensure compliance with the code of conduct, it is included in our terms and conditions. Supplier compliance is managed through our SRM (Supplier Relationship Management) system. Over the years we have established working methods to monitor and audit our main suppliers, and potential and new suppliers are carefully evaluated based on our code of conduct. If we decide to proceed, an audit is performed on site which for example includes the management system, financial status, the purchasing process and flow of goods, as well as the supplier's follow-up systems. With our existing suppliers we conduct regular assessments, and have dedicated employees who work with quality assurance and supplier development.

Based on this, there is a low risk of slavery or human trafficking within our supply chain. Bulten disassociates itself from child labour and work carried out under duress or threat of violence, and supports and respects the protection of internationally asserted human rights. Bulten will develop its assessment model further in order to secure compliance to the Act on Modern Slavery and Human Trafficking. Bulten Ltd complies fully with all aspects of local legislation in all countries in which we operate.

Bulten issues a sustainability report annually since 2017. The 2018 Annual report with Sustainability report can be found at <https://www.bulten.com/en/IR/Annual-reports>

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**Policies and Procedures**

Bulten Group and Bulten Ltd have policies in place to ensure that we treat all employees with dignity and respect, regardless of gender, age, race, religion, ethnicity, sexual orientation, national origin, disability, or any other protected characteristics. Good ethics, high business standards and trust are important concepts that permeate the group's corporate culture and the way to interact with employees, shareholders, customers, suppliers and all other.

During 2018, an annual employee engagement survey took place and actions arising from this have been put in place to ensure high employee engagement. The Bulten Group's Code of Conduct, global HR policy and this statement can be found at <http://www.bulten.com/en/About%20Bulten/Sustainability>

**Recruitment**

All our recruitment is published through Bulten's career website. Bulten only works with reputable recruitment agencies and recruitment websites. All employees who join us are subject to checks in compliance with UK laws to ensure they are genuine applicants.

**Living Wage**

Bulten Group's and Bulten Ltd working hours, wages and overtime are in compliance with UK laws and the laws in all countries where we conduct business. All our employees are paid at least the National Living Wage and reviews are regularly carried out to ensure we meet this standard.

**Reporting of any concerns**

We encourage all employees to report any concerns. Any reports should be made to the immediate manager or his/her superior in accordance with Bulten's internal communication and reporting channels. Employees can also turn to the local Human Resources department, or Bulten groups SVP, HR and Sustainability for information. Bulten will not accept any discrimination or reprisal against employees or any other person who reports a suspected infringement in good faith.

**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 provide any required training to our staff.

**Approval**

This statement has been approved by Bulten Group and Bulten Ltd board of Directors. The statement and policies will be reviewed annually.

Signed:	
Site Director:	Lianne Brown
Date:	17 <sup>th</sup> April 2019

This statement has been reviewed and updated from the 2018 published version.