

# **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

## **Introduction from the Chief Executive**

We're committed to improving our practise to eradicate slavery and human trafficking. As a global organisation, we have a particular responsibility in this respect and it is one we take seriously.

Our recent successes have contributed to a need for us to accelerate our programme of introducing measures and taking appropriate steps to ensure that slavery and human trafficking has no place in our organisation either directly or indirectly through our supply chain. This statement, made pursuant to section 54 (1) of the Modern Slavery Act 2015 (for the financial year ending August 2018), sets out our further detail of the approach being taken by the SC Group to understand all potential modern slavery risks related to our businesses, and the actions being undertaken to mitigate such risks.

## **Background to the Group**

The SC Group is a global provider of bespoke design, development and engineering solutions for equipment operating in harsh environments. The Group has over 200 staff and is headquartered in the UK with additional operations based in Australia. In the most recent financial year, which ended on 31<sup>st</sup> August 2018 our global annual turnover exceeded the statutory threshold of £36 million. This was a better than expected result, meaning that we have become subject to the requirements of section 43 (1) of the Modern Slavery Act 2015 sooner than anticipated.

## **Our Supply Chain**

Our supply chain is diverse and consists of suppliers (variously based in the UK and globally) of raw materials and equipment for use primarily in the defence sector but also in the nuclear, marine, emergency services and renewables sectors, as well as (to a lesser extent) suppliers of services in support of our activities in those sectors.

We also buy in a number of operational services and supplies, primarily from UK and Australia - based suppliers, to support our day-to-day business operations.

## **Anti-Slavery/Human Trafficking Commitment**

Whilst the SC Group has not, in the past, taken any specific steps which were expressly aimed at ensuring that slavery and human trafficking were not taking place in any of our supply chains or in any part of our own business, the SC Group Board is committed to delivering of high standards of corporate governance. Part of this is to ensure that the SC Group is operating in a socially responsible way. We aim to employ the highest ethical and professional standards and will always comply with all local laws and regulations that are applicable to our business.

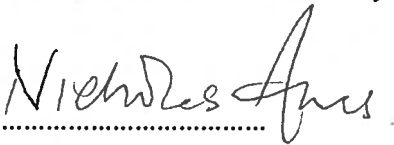
In this context, the SC Group Board considers that the risk of the activities of modern slavery and human trafficking taking place within any of the SC Group's businesses or their activities to be low for the following reasons:

- None of the SC group's operating businesses are located in countries where there is a high risk of these activities taking place
- The countries where we purchase materials, goods and services are predominantly considered low risk
- With regard to our own employees, the SC Group promotes clearly defined values and policies which treat staff fairly and with integrity and respect, and we make minimal use of agency labour (preferring to trust our own direct recruitment practices wherever possible).

To support our commitment, the SC Group intends to undertake the following actions;

- Updating our standard terms and conditions of purchase to include Modern Slavery Act compliance clauses which will contractually oblige our own supply chain to ensure that modern slavery/human trafficking is not occurring within their business and to oblige them to undertake their own due diligence to satisfy themselves that modern slavery/human trafficking is not occurring within their own supply chain.
- Performing risk-based supplier audits which will include specific guidance on evaluating suppliers for indications of modern slavery/human trafficking.
- To support proper application of the Modern Slavery Act, the SC Group ensures a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our businesses.
- Online awareness training on slavery and human trafficking for appropriate staff.

The efficiency and proper implementation of these actions will be reviewed by the SC Group Board following the end of the current financial year.

Signed.....

Date.....

Nicholas Ames - Chief Executive