



QUALITY MANAGEMENT SYSTEM

POLICY

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from the Chief Executive

At SC Group we are committed to improving our practice 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 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.

Our Policies:

Our Slavery & Human Trafficking Statement will be made available on the Company website and intranet site with other Company policies and procedures. To ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business, this commitment is reflected in the following Policies:

- SC Group Corporate Social Responsibility Policy
- SC Group Procurement Policy

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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.

As part of our Supplier Approval Process, Modern Slavery is incorporated within the Supplier Questionnaire. We also ensure they provide evidence (where applicable) of their Modern Slavery Policies and Statements.

Contractual requirements of the Modern Slavery Act 2015 are covered within the Suppliers Terms and Conditions

Anti-Slavery/Human Trafficking Commitment

The SC Group Board is committed to delivering of high standards of corporate governance, 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).
- Our recruitment processes are designed to ensure that all prospective employees are legally entitled to work in the UK, and where applicable subject to DBS checks

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

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- 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 Senior Management and applicable staff
- Performing risk-based supplier audits which will include specific guidance on evaluating suppliers for indications of modern slavery/human trafficking.
- Update Policies and procedures to incorporate Modern Slavery Act 2015 requirements.

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 *Nicholas Ames* **Nicholas Ames, CEO**

Date *12 August 2024*

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