



# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT 2024

**Financial Year End 28<sup>th</sup> February 2024**

## **Organisational Structure and Supply Chains**

Fort Vale Ltd is a group of companies as detailed below.

Fort Vale Engineering Ltd is the world leader in the precision manufacture of valves and fittings for the transportation of bulk liquids in the tank container, road tanker and rail industries.

The transportation of gases and liquids by road, rail and sea must be safe and Fort Vale works with the industry, regulatory bodies and suppliers so that the quality of its design, materials and manufacture ensures that first-class safety is a reality. The company goal is not only to be the preferred supplier of new OEM equipment but also the premier after-sales supplier for spares.

Fort Vale Nuclear Ltd manufactures, assembles and tests critical components for a vast array of Nuclear sectors, with the goal of being a preferred supplier to the Tier 1 organisations within the UK.

Fort Vale is headquartered in Simonstone, Lancashire, UK where the main design, manufacturing, assembly and test facilities are located. Additional manufacturing, assembly and test facilities are located in Shanghai China and offices and repair facilities are located in USA, The Netherlands, Singapore, and Australia which support the core business of Fort Vale Engineering Ltd.

Given the safety critical industries within which Fort Vale operates, the workforce is generally skilled individuals and in permanent employment. To support the business Fort Vale operates a significant supply chain, we currently only work directly with suppliers from developed countries inclusive of China.

## **Policy in Relation to Slavery and Human Trafficking**

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Fort Vale group of companies, hereafter referred to as the Company, has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in

many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants, and business partners.

### **Responsibility for the policy**

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

The General Managers have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. The General Managers and the Board of Directors are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **Compliance**

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

### **Due Diligence of the Policy**

The Company practices robust due diligence during the supplier selection process, including the use of supplier questionnaires, Quality, Environment, Health and Safety reviews, along with supplier intelligence sources such as Dun & Bradstreet to ensure that all supplies are financially, ethically and legally sound, this is supported by supplier assessment audits when deemed appropriate. These processes allow the Company to manage supply chain risk.

## Exposure to modern slavery and human trafficking risk

We have considered the exposure of the Company to slavery and human trafficking, taking into account our supply chain and the geographical nature of our suppliers and the types of products and services secured, we consider the exposure to modern slavery and human trafficking to be low risk.

## Training and communication

The Company has worked to increase awareness within our organisation to ensure employees have a level of understanding of the risks associated with modern slavery and human trafficking in our supply chain and in our business.

Training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

## Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Instances of Modern Slavery and Human Trafficking identified within the supply chain shall be reported to the appropriate local authorities in accordance with the country's legislation. The Company may also choose to terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in Modern Slavery and Human Trafficking.

## Declaration

This statement has been made in accordance with reporting requirements of clause 54 part 6 of the UK Modern Slavery Act, for the financial year ending 28th of February 2024, this statement applies to Fort Vale Engineering Ltd, Fort Vale Ltd and Fort Vale Nuclear Ltd.

This statement has been approved by the Board of Directors and has been signed by the General Managers on behalf of the Board of Directors.

<p>Signed: For Fort Vale Engineering Ltd</p>  <p>Shaun Laycock General Manager</p> <p>Date: 12 August 2024</p>	<p>Signed: For Fort Vale Nuclear Ltd</p>  <p>Peter Staveley General Manager</p> <p>Date: 12 August 2024</p>
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