

# Modern Slavery Act Transparency statement

Statement on slavery and human trafficking for financial year 2018

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Somers Forge Limited modern slavery and human trafficking statement for the financial year 1st January to 31 December. This statement provides background to our organisation and our supply chains and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our organisation or any of our supply chains.

## Our organisation

From our manufacturing facility in Halesowen, situated right in the heart of the industrial Black Country, we operate a varied range of Forging Presses and Hammers which gives us a unique capability to manufacture components from as little as 1 Kg to 80 tonnes with lengths up to 23 Metres.

Our Machining and Engineering facilities compliment the range of forgings we produce offering Turning, Boring and 5 Axis milling, which enables us to supply fully finished components ready for installation. We have the ability to machine products right up to 100 tonnes.

With continuous investment Somers combines the latest technology with traditional quality skills to compete and thrive in a very diverse global market. At first you may think you have never come across our products

but from the deepest oceans to outer space our forgings are pushing the boundaries of manufacturing excellence!

Our activities are overseen by our Board of Trustees who have ultimate responsibility for all that we do. Somers Forge Limited day-to-day management resides in the Executive Board which reports directly to the Board of Trustees.

#### **Our Policies and Procedures**

Somers Forge Limited have a number of polices and procedures which reflect our commitment to acting properly in all of our business relationships, and we ensure that we implement and enforce effective systems and controls.

Somers Forge Limited has a commitment against slavery and human trafficking in all forms and strives to act ethically, at all times, in all our work, business dealings and various relationships; ensuring that slavery and human trafficking does not take place within our organisation or our supply chains.

Somers Forge Limited policies and procedures are applicable to all our employees as well as those engaged on a temporary or consultancy basis.

The current key polices and procedures which contribute to minimising the risk of modern slavery and human trafficking in our organisation and our supply chain include the following:

**Risk Management Policy** -designed to keep all our activities in line with all applicable laws, regulations and codes of governance (including in relation to slavery and human trafficking).

**Health and Safety Policy** – to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.

**HR Procedures** – ensure that all employees hold the appropriate 'right to work' documents and are paid and in accordance with the National Living Wage. Also, to put policies and procedures in place to safeguard

the interests of all employees, including any unpaid work experience volunteers working at Somers Forge Limited.

**Anti – Bribery and Corruption –** to account and report any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption.

**Whistleblowing Policy** – provides guidance on how to report suspected dangers or wrongdoing in the workplace. All Somers Forge Limited employees, including those engaged on a temporary or consultancy basis, are expected to report any concerns relating to slavery or human trafficking. Any concerns raised will be duly investigated with action taken as necessary with any unfavourable treatment on the individual reporting the concern.

### **Our Supply Chains**

We deal with many organisations through our operational divisions and we use suppliers to support the operations of our organisation. The key areas in which we engage suppliers to provide goods and services are:

Online/Internet

Goods and Services

**Events** 

IP/IT/Design

Finance, legal and investments

**Professional Services** 

Employment

The Somers Forge Limited template agreements and standard terms and conditions require suppliers to comply with the law. This includes specific reference to the Somers Forge Limited commitment against modern slavery and human trafficking.

We are satisfied that our key suppliers have appropriate policies in place in relation to modern slavery and human trafficking. We continue to

review all our suppliers and regularly assess our key suppliers in more detail to ensure that the appropriate policies in place to minimise the risk of slavery and human trafficking in their business.

Due diligence and monitoring is on-going and under periodic review to improve supplier vetting and to further minimise a range of risks, including slavery and human trafficking.

## **Training**

We work to ensure the adequate information and training is provided to all Somers Forge Limited employees, contractors or visitors on all relevant matters.

In terms of information and training:

All new joiners attend an induction session which includes information and training on our policies and procedures. We continuously review our induction sessions and ensure that we include specific refence to modern slavery and human trafficking and what we so to minimise the risk of this occurring in our organisation and our supply chain.

Managers are provided with relevant training and are assisted by our HR dept in HR – related matters including in relation to recruitment, remuneration and employee wellbeing.

Assisted by our Legal and Risk divisions, we will continue to seek out information and training to help identify risks in both our organisation and supply chain, including in relation to slavery and human trafficking.

Samson Folkes

**Managing Director**