



Slavery and Human Trafficking Statement For Hadley Industries Holdings Limited For The Year Ending 31 March 2016

Introduction

This statement is pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement on behalf of Hadley Industries Holdings Limited for the financial year ending 31 March 2016. It sets out the steps Hadley Industries Holdings Limited has taken during the previous financial year to address the risk of slavery and human trafficking taking place within its own operations and supply chains. For the purpose of this statement joint venture arrangements are treated as being part of our supply chains.

Our Business

Hadley Industries Holdings Limited is the UK's largest independent manufacturer of cold rolled metal profiles. We are the parent company of the Hadley Group with its Head Office based in the United Kingdom. The Group operates globally and has over 500 employees based in six countries with a global annual turnover of £120 million.

Our supply chains are extensive, numbering over six hundred suppliers over six countries.

Our Commitment

Hadley Industries Holdings Limited has a commitment to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

We undertake "right to work" checks for all of its employees prior to commencing employment. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.

We operate a Whistleblowing Policy which is aimed primarily at employees, but is also available to others working in our supply chains in order to encourage the reporting of any suspected wrongdoing.

As part of our initiative to identify and mitigate risk, various existing policies and practices have been reviewed and have either been updated accordingly or are in the process of being updated.

We are intending to implement an Anti-slavery Policy, which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We are also intending to implement an employee Code of Conduct which all new employees will have to sign up to on joining the business. The Code of Conduct will provide a set of rules to ensure employees are upholding the highest level of ethical conduct in their day to day business.

Training will be provided to those employees in roles most likely to be in a position to identify and address potential modern slavery risks, including Human Resources and Procurement functions. This training is to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within the business. In addition, we intend for the induction process for new employees to include an awareness of the risks of slavery and human trafficking within the business and its supply chains.

We communicate to our Tier1 suppliers the expected standards in addressing the risk of slavery and human trafficking in its supply chain. We will be making compliance with the Modern Slavery Act 2015 a part of our negotiations, and contracts, with such suppliers. In addition, we are intending to implement an auditing process which our Tier 1 suppliers will be subject to in order to ensure that compliance with the Modern Slavery Act 2015 is taking place and to identify any modern slavery practices. If any issues are identified as a result of this auditing process, appropriate action will be taken.

As part of our ongoing commitment, there will be an increased focus on the requirement for a commitment by our other suppliers to eradicate slavery and human trafficking in their own business and supply chains. A standard contract clause will be included in contracts with such suppliers which will require compliance with the Modern Slavery Act 2015. Suppliers who breach this obligation will face appropriate action, which could include termination of contracts.

This statement was approved by the board of directors of Hadley Industries Holdings Limited.

Signed:



Stewart Towe

Group Chairman and Managing Director

