



HEC Precision Ltd - Ethics Policy

BSP-1-10 Rev1

Policy Statement

Modern Slavery is a crime and an unacceptable violation of human rights. It can take many forms such as slavery, forced labour and human trafficking. It will not be tolerated in any guise within our organisation. Company Directors take overall responsibility of ensuring that our ethics policy obligations are communicated internally and adhered to by all employees. Furthermore, we ensure that all approved suppliers are aware of their obligation to apply similar ethics policies which shall include the requirement to flow down similar requirements within their supply chain.

Our Business

Our Business is a UK based manufacturing facility that specialize in the production of precision machined components for the Aerospace and all associated industries.

We are committed to maintaining the highest levels of inhouse ethical conduct, labour welfare, health & safety and environmental standards whilst fully respecting the human rights and civil liberties of all employees. This level of respect must extend to all customers, suppliers and any member of the public, local community, or local services.

Our People

All permanent and any contract employees are checked by HR for identity, employment and academic history, nationality and right to work status which includes a security and criminal record check.

Each employee is issued with a contract of employment that define matters required by employment law that include place of work, working hours, code of conduct, job role, pay rate, holiday periods and notice periods.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking within our business or any part of our supply chain by managing systems and controls to mitigate the risk of any such violation of human rights. We endeavor to ensure that policies and procedures relating to the modern slavery act of 2015 are in line with our own cultures and values.

Slavery and Human Trafficking Risk Mitigation

As part of our strategy to mitigate risk we:

- Undertake pre-employment checks
- Communicate the requirements and responsibilities of the Ethics Policy to all employees
- Identify potential risk areas within our supply chain
- Undertake pre-approval supplier checks
- Communicate within our supply chain the requirement for them to maintain an Ethics Policy
- Maintain long standing relationships with suppliers so that expectations can be easily monitored and verified
- Encourage reporting of concerns ensuring confidentiality of any reporting event
- Audit the systems in place to verify compliance and process effectiveness

Responsibility for the Policy

The Company Directors have overall responsibility to ensure that our legal and ethical obligations are met, and that all those under our control comply with it.

The Purchasing team are responsible for communicating and monitoring ethical requirements within the approved supply chain

The HR team are responsible for any ethical queries or reporting from employees and the communicating of any unethical incidents to Directors

The Quality Representative is responsible for embedding ethical requirements within our business processes and procedures. An authorized internal auditor must monitor and audit for compliance annually in accordance with the requirements of our quantity management system and AS9100

Training

To ensure a high level of understanding and create awareness of the risks of modern slavery and human trafficking, we provide training to all company employees. We also require approved suppliers to provide training to their staff and flow down this requirement to their suppliers.

This statement is made in pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking statement for the year ending 31st December 2023

Signed

Kevin Manhood

Managing Director, HEC Precision Ltd