

## **Anti-slavery statement for financial year 2019/20**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Enrichment Technology Company Limited and its wholly owned subsidiaries, Enrichment Technology UK Limited, Enrichment Technology Nederland B.V. and Enrichment Technology France, SAS, Diversification Holdings Limited, Pronexos B.V., NPROXX Jülich GmbH, NPROXX B.V., Stornetic GmbH, (the **ETC Group**) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The ETC Group has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

The ETC Group has an annual turnover in excess of £36m and operates in the areas of: uranium enrichment technology and related services, the production of specialised, carbon fibre reinforced products and certain other hi-tech products and services. The ETC Group has operations in the UK, the Netherlands, Germany and France.

We have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Anti-slavery policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. **Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. **Code of Ethics.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Our suppliers

The ETC Group operates a supplier policy in accordance with our policies listed above and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery and on site audits, which, amongst other things, include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business;
2. They hold their own suppliers to account over modern slavery;
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate);
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations; and
5. We may terminate the contract at any time should any instances of modern slavery come to light.

### Training

We provide training for our procurement/commercial team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. All Directors of ETC have been briefed in this subject.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No issues are raised at the regular internal management team meetings (conducted on all our operational sites; and
- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This policy statement is in accordance with Section 54 of the Modern Slavery Act 2015, constitutes ETC Group's anti-slavery and human trafficking statement. The Board of Directors approved it on 6 February 2019.

For transparency, this statement will be published on the ETC website for the public, consumers and employees to view.

Name: **Reinhard Hinterreither (CEO)**

Signature:



Date: 6 February 2019