

Modern Slavery Statement

This Statement relates to Nasmyth Group Ltd and its subsidiaries, Nasmyth Coventry Ltd, Nasmyth technologies Ltd, Nasmyth Bulwell Ltd, Nasmyth Henton Ltd, Nasmyth IEC Ltd, Nasmyth Doughty Ltd, Nasmyth West Middlesex Ltd, Nasmyth TMF Inc and Nasmyth India PVT Ltd (collectively referred to as Nasmyth Group) for the financial year ended 31st January 2019.

About Nasmyth Group

Nasmyth is a global group of Engineering Companies offering precision engineering and metal treatments for the Aerospace, Automotive, Nuclear, Energy, Defence, Medical and Space industries. Nasmyth Group has continued to grow having five divisions supported by twelve complementary precision engineering and metal treatment businesses across ten sites throughout the globe.

Responsibility and Accountability

Nasmyth Group has a zero-tolerance approach and is committed to driving out modern day slavery and human trafficking. We recognise the responsibility that our Group shares with our suppliers to tackle the growing global issue of Modern Slavery. We promote a high level of ethical trading both within our business and supply chain. Staff are expected to report concerns and management are expected to act upon them.

Due to the highly-skilled nature of the activities undertaken by our employees, our exposure to low-skilled and temporary employees is reduced.

Policies

As we expand our global presence, we expect our employees and business partners to act with honesty, integrity and in good faith when dealing with the Group, its Customers and Suppliers. Nasmyth Business Ethics Policy is intended to provide guidance for this purpose. Everyone within the Group is required to comply with the Policy, including board members, senior executives and employees.

Nasmyth Business Ethics Policy, which includes our policy relating to Anti-Slavery and Human Trafficking, outlines the responsibility of every employee to help ensure that all Nasmyth global activities meet our high standards for behaviour and business ethics and establishes accountability for compliance with the law and policy.

The Policy emphasizes the importance of open dialogue across the board, including reporting of potential violations and concerns. We actively encourage our employees to raise any concerns or suspected breaches directly through line management, HR or the Head of Contracts and Commercial.

Supply Chain due diligence and verification

We operate a supplier policy and maintain a preferred supplier list. All new Suppliers are required to complete a Supplier Assessment Questionnaire and we conduct due-diligence on all suppliers before allowing them to become a preferred supplier. We have updated our standard terms and conditions of purchase with suppliers to include compliance with the Modern Slavery Act 2015.

As a Tier 1 Supplier to the Aerospace industry we are guided to source from our Customer approved Source. These Suppliers still have to meet Nasmyth Group requirements and are vetted in the same way as our other suppliers.

We acknowledge that there is a risk of exposure to modern slavery in our supply chain; as part of commitment to mitigating any risks we have committed to:

- Standardise the use of supplier questionnaires across the Group and include a question on the supplier's policies and practices in relation to identifying and preventing modern slavery.
- Establish a Supplier Code of Conduct which will be issued to all new suppliers.

This Statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015. This statement sets out the steps taken by Nasmyth Group to ensure that there are not incidents of modern slavery within Nasmyth business and its supply chain, in accordance with the UK's Modern Slavery Act 2015. It has been reviewed and approved by the Board of Directors.

Next review date: 31/01/2020

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Signed by

Peter Smith

Chief Executive Officer

For and on behalf of Nasmyth Group Ltd.