

SHD Composite Materials Ltd  
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## Modern Slavery and Human Trafficking Statement for SHD Composite Materials Ltd

### Overview

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to minimise the risk of modern slavery in our business and supply chains. SHD Composite Materials Ltd is committed to acting ethically and with integrity in all of its companies' dealings and relationships.

### Our commitment to the principles of the Modern Slavery Act 2015

SHD Composite Materials Ltd opposes modern day slavery or human trafficking in any form and has strong measures in place to ensure that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

Shared core values are at the heart of our business defining who we are, how we work, what we believe in and what we stand for. We aim to uphold the highest ethical and professional standards and are committed to earning the respect of our personnel, customers and suppliers globally.

This statement is made to reaffirm our commitment to upholding basic human rights and prohibiting forced or involuntary labour in the production of SHD Composite Materials Ltd products.

### Our supply chain

SHD Composite Materials Ltd sources raw materials from across the globe. We seek to only deal with reputable suppliers who share our zero-tolerance approach in respect of human rights including welfare, trafficking and modern slavery.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

A prospective supplier must, amongst other requirements:

- comply with all of the applicable laws, statutes, regulations and codes of the countries it is present in;
- maintain a safe and civilised work environment;
- uphold the human rights of all employees and adhere with all laws, regulations, codes and government guidelines on human rights;
- take all reasonable steps to ensure there is no slavery, human trafficking or child labour taking place in its supply chains or elsewhere in its business; and
- keep up to date with its understanding of the Modern Slavery Act 2015 and be in compliance with its requirements at all times.

### Internal policies

SHD Composite Materials Ltd has a number of internal policies in place which ensure that slavery and human trafficking are not taking place in its businesses, all of which are available for employees

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SHD Composite Materials Ltd and SHD Composite Materials d.o.o. are subsidiaries of SHD Holdings Ltd (registered number 10266695)

SHD Composite Materials Ltd - Registered office: Unit 4, The Reservation, Sleaford Enterprise Park, Sleaford, Lincolnshire, UK, NG34 7BY  
Registered number: 7078299 - VAT number: 981 5384 88

SHD Composite Materials Europe d.o.o. - Registered office: Cesta krških žrtev 135B, 8270, Krško Slovenija  
Registered number: SI8021279000 - VAT number: SI81458878

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to access via the company intranet. These include policies in respect of anti-bribery and corruption, whistleblowing, diversity and recruitment as well as the modern slavery policy. SHD Composite Materials Ltd carries out "right to work" checks on all direct employees prior to them commencing their roles in the business. This includes checking that the employee has a valid visa and is of an appropriate age to work.

### **Due diligence**

SHD Composite Materials Ltd uses its own standard terms and conditions which includes anti-slavery and human trafficking provisions. If a supplier breaches any of these provisions, SHD Composite Materials Ltd has the right to terminate the contract with that supplier.

### **Training**

Our anti-slavery policy is posted in the company intranet together with all other company policies and procedures. It reflects our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations and acting ethically and with integrity in all our business activities and relationships.

We expect our workforce to apply ethical standards in their day-to-day business and report any issues of concern.

### **Further steps**

SHD Composite Materials Ltd recognises that modern slavery and human trafficking are evolving issues. SHD Composite Materials Ltd will continue to monitor the effectiveness of the steps it is taking to minimise the risk of modern slavery in our business and supply chains.

This statement was approved by the Board of Directors of SHD Composite Materials Ltd in accordance with section 54 of the Modern Slavery Act 2015 for the financial year ending 30 November 2024.

Helen Doughty

Founding Director, SHD Composite Materials Ltd

For and on behalf of SHD Composite Materials Ltd

Dated: 5<sup>th</sup> February 2025

Approved by the Board of Directors on 5<sup>th</sup> February 2025

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