

## **Modern Slavery Act Statement**

### **Introduction**

Senior is committed to preventing slavery and human trafficking in its corporate activities and in its supply chain.

This statement sets out the Company's actions to assess potential modern slavery risks related to its business and the adoption of processes to minimise any risk of slavery or human trafficking in the Company's business and supply chain. This statement relates to actions and activities during the financial year to 31 December 2019.

### **Structure of the Senior plc Group and its supply chain**

Senior is an international, market-leading, engineering solutions provider with 30 operations in 13 countries (UK, USA, Canada, Mexico, South Africa, France, Germany, Holland, Czech Republic, India, Thailand, Malaysia and China). Senior designs, manufactures and markets high-technology components and systems for the principal original engineering equipment producers in the worldwide aerospace, defence, land vehicle and energy markets.

Each Group operation is responsible for managing its own supply chain, although there are circumstances where operations collaborate to jointly purchase materials. A significant proportion of Senior's supply chain is involved in the purchase of various metals or metal products (such as castings, casings, tubes or sheet metal) from US-based and European suppliers, with a sizeable element of these materials being nominated or directed by our customers.

### **Relevant policies**

We are committed to conducting our dealings, whether with customers, suppliers, employees or the communities in which they are based, with the utmost integrity. To achieve this aim, Senior operates the following policies that include its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations:

- **Code of Conduct**

Senior has a Code of Conduct. All employees have received training on the Code of Conduct in 2019. Wherever in the world our operations are located or have dealings, our employees are required to respect people and value diversity. Our Code of Conduct has also been rolled out to our suppliers who are expected to conduct their business in line with the Code and the Responsible Sourcing Policy.

- **Responsible Sourcing Policy**

Senior has a Responsible Sourcing Policy which was updated in 2018 to include additional requirements and guidance around Modern Slavery. Suppliers are expected to adhere to this policy at all times. To define the environmental, ethical and social responsibility principles that its suppliers must adhere to, Senior has developed 10 key principles. These Principles are anchored in internationally recognised standards, including the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights and are as follows:

1. Business Ethics
2. Wages and Benefits
3. Working Hours
4. Non-Discrimination
5. Child labour
6. Freedom of Association
7. Health and Safety
8. Fair procedures and remedies
9. Harsh and inhumane management practices
10. Environmental Management

The Group's operations have communicated these principles to all key suppliers, and audits of some suppliers have taken place.

Senior aims to be a good partner in return, and will work with suppliers to support any necessary improvements, encourage continual improvement, and reward good performance.

- Whistle Blowing Policy

Senior's long-standing Whistle Blowing policy encourages and enables all its employees, customers and other business partners to report any ethical concerns they may have concerning the direct activities of, or the supply chains of, the Group. This includes any circumstances that may give rise to the risk of slavery or human trafficking. The whistle blowing procedure is designed to make it easy for workers to raise concerns, without fear of retaliation.

- Awareness-raising programme

In 2019, as part of the Group's on-going Code of Conduct training, awareness training was delivered to all employees to help them identify and prevent slavery and human trafficking and highlight what employees can do to flag potential modern slavery or human trafficking issues.

## **Board approval**

This statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 and is applicable to all Senior plc group companies including Senior plc, Senior UK Limited and Lymington Precision Engineers Co. Limited. The statement has been approved by the Company's Board of Directors on 26 February 2020, who will review and update it annually.

Signed on behalf of the Board by

David Squires  
**Group Chief Executive, Senior plc**

**Date: 26 February 2020**