



LAWTON
TUBES

The nations copper specialist

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Modern Slavery and Human Trafficking Statement:

This Statement is prepared in order to give guidance and instruction on the minimum standards acceptable to our UK business in the manufacture of raw materials supplied to our companies and of finished products. In the formulation of this statement due recognition has been taken of the Modern Slavery Act 2015.

The Company recognizes its moral and legal responsibility with regards to modern slavery and human trafficking and will endeavor to ensure no such activities arise in the operation of our business. Our aim is to achieve the highest ethical standards with regards to modern slavery and human trafficking and as a minimum, we will comply with all relevant legislation and we will achieve this with the cooperation of all our staff.

Management will periodically review this policy and will do so especially in the event of any major organizational changes, new legislation or serious breaches of the policy.

Our Supply Chains:

Our supply chains include local, national and international partners and the Company will not knowingly do business with parties who violate applicable laws and regulations, including local, environmental and employment laws.

Business Objectives:

1. The elimination of modern slavery and human trafficking within our business operations through effective corporate governance.
2. The provision of effective training relating to modern slavery and human trafficking issues for all relevant personnel ensuring all relevant personnel understand their role and expected behavior.
3. To ensure modern slavery and human trafficking is an agenda item at Directors meetings on an annual basis so that the above arrangements remain suitable for the needs of the business.
4. To ensure that adequate resources are made available to meet these objectives.

Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training to relevant personnel.

Protection:

Employees, agency workers and contractors who wish to raise any issues with regards to the Company's business practices, in particular those relating to modern slavery and human trafficking, can do so under the protection of the Company's Whistleblowing Policy. Such matters can be raised with either a manager, or Director.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 30th September 2016.

Giles Lawton

Managing Director (Operations)

29/09/2016

Oliver Lawton

Managing Director (Commercial)