

MODERN SLAVERY POLICY STATEMENT

Tom Martin & Company Limited is an SME which employs less than 100 people, and operates in the metals recycling sector.

This statement sets out the actions taken by the Company to understand all potential Modern Slavery risks related to it's business, and to ensure that all reasonable efforts are taken to prevent slavery, or human trafficking within it's business, and it's supply chains.

The Managing Director has overall responsibility for the anti-slavery and human trafficking measures taken by the business, and has put in place several processes including carrying out due diligence checks for new staff, suppliers and sub-contractors, broadly, these are as follows :

RECRUITMENT

- The only temporary staff used by the Company are very occasional Goods Vehicle Drivers, provided by two approved agencies, who have both provided formal confirmation of their arrangements with regards to Modern Slavery and Human Trafficking.
- The vast majority of staff are recruited directly, on permanent contracts following all requirements of UK legislation, such as paying all staff at a rate which at least meets the legal minimum wage and ensuring that maximum working hours are not exceeded.
- All new staff are inducted, and are informed how to spot, and how to report any concerns relating to Modern Slavery, internally via the Company's whistleblowing and grievance procedures, and how to seek help and advice from the Modern Slavery helpline.

ANTI-BRIBERY AND CORRUPTION POLICY

- Tom Martin & Company Limited are committed to the highest standards of ethical conduct and integrity in our business activities, and have a robust policy to prevent any individual or group within the business, from offering or receiving any form of inducement, in return for commercial or personal advantage or reward.

SUPPLIER / SUB-CONTRACTOR SELECTION, APPROVAL AND CONTROL

- All prospective suppliers and sub-contractors are subject to a thorough approval process prior to appointment, and once approved, are subject to ongoing checks of their suitability and competence, to ensure that they continue to meet the standards required by Tom Martin & Company Limited
- Key suppliers and contractors are also subject to periodic site audits of their operations.
- Any suppliers or contractors identified to be sub-standard, are informed of the issues, and are required to implement corrective measures to rectify the problem.
- Those who fail to improve, and those who are considered to seriously violate the standards required are removed from the approved register.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, in relation to actions and activities during the financial year ending 31st December 2026 and is approved on behalf of the business and it's Board of Directors by the Managing Director – Mr Mark Perkins.

Signed:



Date: 06 / 01 / 2026

