



VULCAN SEALS



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Modern Slavery Statement of Vulcan Engineering Limited, Vulcan Seals Inc., and Vulcan Engineering B.V. (“Vulcan Seals”)

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery statement for the financial year ending 31st December 2023. This statement was approved by the Vulcan Engineering Limited board of directors on 15th March 2024.

Modern slavery is a crime and violation of human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It is a growing global issue that transcends age, gender and ethnicities (“Modern Slavery”).

Our Pledge

We have a zero tolerance approach to Modern Slavery and we are committed to the prevention, deterrence and detection of Modern Slavery within our business and within our supply chain.

It is our policy to conduct all business activities with honesty, integrity and at the highest possible ethical standards. We are fully committed to implementing and enforcing effective systems and controls within our business and within our supply chain to continually challenge our ability to combat Modern Slavery.

Our Business and Its Structure

The Vulcan group of companies (the “Vulcan Group”) was established in 1986 and has rapidly grown in to one of the world's leading specialists in the design and manufacture of sealing products. The Vulcan Group consists of subsidiaries which are strategically placed around the globe to support the requirements of our customer base.

The Vulcan Group has over 150 employees worldwide, operates in 40 countries and has a global turnover of £30m (year end 31 December 2023).

Our Policy

Within the present financial year, Vulcan Seals has used its Modern Slavery & Human Trafficking Policy (“the Policy”) to assist in ensuring that no Modern Slavery takes place in any part of our organisation or supply chain.

Vulcan Seals implements a zero tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation.

The Compliance Committee has the delegated authority and responsibility of Vulcan Engineering Limited for the prevention, deterrence and detection of unethical practices within our organisation. Responsibility for the Modern Slavery Policy lies with the Compliance Committee. All reports of actual or suspected breaches of the Policy are reported to and investigated by the Compliance Committee.

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Supplier Adherence to Our Values

In order to ensure that all persons within our supply chain comply with our values and zero tolerance policy on Modern Slavery, Vulcan Seals has implemented measures to assess and monitor our supplier's conduct in respect of Modern Slavery.

Vulcan Seals has taken steps to include specific prohibitions against the use of Modern Slavery in our contracting process in our Standard Terms of Purchase which were rolled out to all subsidiary companies within the Vulcan Group. There is a specific provision included to ensure that our suppliers are adhering to the Modern Slavery Act 2015 and all statements within this Statement. We expect our suppliers to comply with those prohibitions and hold their own suppliers to the same high standards.

Vulcan Seals conducted a supply chain risk assessment of our primary production and sourcing countries. We identified that whilst the majority of Vulcan Seals spend on product sourcing is with suppliers from countries with a lower risk of Modern Slavery and with developed Modern Slavery laws and government commitment (Global Slavery Index 2016), approximately 70% of Vulcan Seals spend on core product sourcing is with suppliers from India and China - countries within the top 5 Modern Slavery risk countries.

Over the next year, it is our plan to keep our efforts focused on the areas within our supply chain where there is potential for an elevated risk of Modern Slavery. Therefore, Vulcan Seals' primary focus in 2024 will be our supply chain in India to ensure that there are robust and proper provisions in place with all suppliers in respect of Modern Slavery, especially for any new suppliers.

Training

In order to ensure a proper understanding of the risks posed by Modern Slavery in the context of our organisation and supply chain, we intend to arrange internal training to employees of the Vulcan Group as appropriate.

We want to help our people to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context. We will be highlighting the www.modernslavery.co.uk site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of telephone helplines. We will be developing resources and we will make them available to all our employees including links to the www.modernslavery.co.uk website and the Modern Slavery Act.

Reporting

We already have in place a whistleblowing hotline to report knowledge or suspicion. This ensures that anyone who has concerns will have means of raising their concerns confidentially. Our hotline is available to report any suspicions our employees may have regarding Modern Slavery and our employees will be signposted to this in any resources that we develop in relation to Modern Slavery.

Contact

Questions and comments regarding this statement are welcomed and should be addressed to hr@vulcanseals.com

Adam Bingley, Executive Director

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