

## STATEMENT ON MODERN SLAVERY

### Introduction

Bulten Group and Bulten Limited, are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's slavery and human trafficking statement for the financial year ending 31 March 2022.

### Organisational Structure and Business

Bulten Limited is based in the United Kingdom and is a subsidiary of Bulten. The parent company is Bulten Fasteners AB, registered in Gothenburg, Sweden.

Bulten Ltd imports and exports fasteners for the automotive industry. Bulten introduced its Code of conduct for suppliers in 2017. The code is specially designed for suppliers, the aim being to communicate more clearly our demands when it comes to business ethics, health and safety, environmental requirements, social responsibility, human rights and this statement. It has been implemented through communication and distribution to all active suppliers. Bulten's suppliers are expected to accept Bulten's requirements set out in the code of conduct.

To further ensure compliance with the code of conduct, it is included in our purchasing terms and conditions. Supplier compliance is managed through our SRM (Supplier Relationship Management) system. Over the years we have established working methods to monitor and audit our supply chain, and potential and new suppliers are carefully evaluated based on our code of conduct. If we decide to proceed, an audit is performed on site which for example includes the management systems, financial status, the purchasing process, sustainability, flow of goods, as well as the supplier's follow-up systems. Since 2020 Bulten asks its suppliers to conduct a sustainability self-assessment questionnaire (Drive Sustainability) and Bulten rates its suppliers accordingly. With our existing suppliers we conduct regular assessments, and have dedicated employees who work with quality assurance and supplier development.

Based on this Bulten has minimised the risk of slavery or human trafficking within our supply chain. Bulten disassociates itself from child labour and work carried out under duress or threat of violence, and supports and respects the protection of internationally asserted human rights. Bulten will develop its assessment model further in order to secure compliance to the Act on Modern Slavery and Human Trafficking. Bulten Ltd complies fully with all aspects of local legislation in all countries in which we operate.

Bulten issues a sustainability report annually since 2017. The 2021 Annual and Sustainability report published on 6<sup>th</sup> April 2022 can be found at:

<https://www.bulten.com/en/IR/Annual-reports>

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## **Policies and Procedures**

Bulten Group and Bulten Ltd have policies in place to ensure that we treat all employees with dignity and respect, regardless of gender, age, race, religion, ethnicity, sexual orientation, national origin, disability, or any other protected characteristics. Good ethics, high business standards and trust are important concepts that permeate the group's corporate culture and the way to interact with employees, shareholders, customers, suppliers and all other.

During November 2021, an annual employee engagement survey took place and actions arising from this have been put in place to ensure high employee engagement. The Bulten Group's Code of Conduct and this statement can be found at <http://www.bulten.com/en/About%20Bulten/Sustainability>

## **Our Principles**

Bulten supports and respects human rights and is committed to fair and ethical work practices. Bulten has no tolerance for any form of child labour or modern slavery, including forced or compulsory labour. All use and support of child labour or modern slavery, either directly by Bulten or indirectly by Bulten's suppliers or business partners, is strictly prohibited.

## **This is how we act**

- If you are hiring, observe the minimum employment age according to national law in your country.
- Employees under the age of 18 should not be allowed to perform hazardous work tasks.
- Managers should ensure that no employees are forced to work. All employees should have a free choice to work and they should be free to leave under applicable employment law and in accordance with their employment agreements.
- Report any observation or suspicion of child labour or modern slavery, regardless of whether the observed or suspicious activity is carried out by Bulten itself or by Bulten's suppliers or business partners, to your manager or your manager's manager.
- Bulten checks the ID documents of all new employees but never require any form of deposit nor do we confiscate ID documents from our employees or contractors etc.
- Bulten also requires Bulten's business partners, which conduct work for Bulten, to check the ID documents of its employees and to report the result of such controls to Bulten. Bulten monitors the sustainability compliance and progress of its suppliers. Bulten's business partners are required to regularly and explicitly confirm compliance with Bulten's principles for child labour and modern slavery.

## **Recruitment**

All our recruitment is published through Bulten's career website. Bulten only works with reputable recruitment agencies and recruitment websites. All employees who join us are subject to checks in compliance with UK laws to ensure they are genuine applicants.

Living Wage

Bulten Limited working hours, wages and overtime are in compliance with UK laws and the laws in all countries where we conduct business. All our employees are paid at least the National Minimum Wage and reviews are regularly carried out to ensure we meet this standard.

Reporting of any concerns

We encourage all employees to report any concerns. Any reports should be made to the immediate manager or his/her superior in accordance with Bulten’s internal communication and reporting channels. Employees can also turn to the local Human Resources department, or Bulten groups SVP, HR and Sustainability for information.

You may of course report your concerns anonymously via Bulten’s anonymous reporting/whistleblower channel at <https://report.whistleb.com/Bulten>

However, we encourage you to identify yourself when making a report since this allows Bulten to initiate a confidential dialogue with you and to properly identify the issue. If you identify yourself, be sure that Bulten will make every effort to keep your identity strictly confidential within the company.

If you make a report, Bulten will initiate an investigation of the situation and take appropriate action. The investigation will be handled promptly, confidentially and in a fair, impartial and objective manner. All investigations shall take into account the legal rights of the person submitting the complaint as well as the person subject to the investigation. The persons carrying out the investigation must be unbiased and independent and must not be in any way involved in or affected by matters being investigated.


Bulten will have zero tolerance for any reprisals against you, regardless of the outcome of the investigation, if you reported your concern in good faith.

**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 will provide any required training to our staff. All relevant staff receive training via E-Learning on the Code of Conduct and awareness of modern slavery and human trafficking.

**Approval**

This statement has been approved by Bulten group and Bulten Limited board of directors. The statement and policies will be reviewed annually.

Signed:	
Managing Director:	Lianne Brown
Date:	19th April 2022

This statement has been reviewed and updated from the 2021 published version.

