

## STATEMENT ON MODERN SLAVERY

### Introduction

Bulten Group including all its subsidiaries 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 also made pursuant to section 54(1) of the Modern Slavery Act 2015 in the UK, and constitutes our organisation's slavery and human trafficking statement for the financial year ending 31st March 2024.

### Organisational Structure and Business

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

Bulten Ltd imports and exports fasteners for mainly the automotive industry. Bulten introduced its Code of conduct for suppliers in 2017, it has since been reviewed and updated regularly. The code is specially designed for suppliers, the aim being to communicate more clearly our demands when it comes to environmental, social and governance (ESG) issues as e.g., business ethics, health and safety, environmental requirements, social responsibility, human rights, labour law and this statement. The code is signed by all new suppliers together with the contract. The code has also been distributed to and signed by the majority of the active suppliers, and the aim is to achieve acceptance from all suppliers.

To ensure compliance with the code of conduct, it is included in our terms and conditions with suppliers. Supplier compliance is managed through our SRM (Supplier Relationship Management) system. Over the years we have established working methods to monitor and audit our main suppliers, and potential and new suppliers are carefully evaluated based on our code of conduct in the screening process for new suppliers. If we decide to proceed, an audit is performed on site of suppliers of direct material which for example includes the management system, financial status, the purchasing process and flow of goods, supplier's follow-up systems as well as ESG performance. With our existing direct material and transport suppliers we conduct regular assessments, which includes ESG performance and have dedicated employees who work with quality assurance and supplier development.

Based on this Bulten has reduced the risk of slavery or human trafficking within our supply chain significantly. 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 complies fully with all aspects of local legislation in all countries in which we operate.

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Bulten issues a sustainability report annually since 2017. The 2024 Annual report published on 3<sup>rd</sup> April 2024 can be found at:  
<https://www.bulten.com/en/IR/Annual-reports>

### **Policies and Procedures**

Bulten Group, including 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 2023, 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, global HR policy 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**

- When hiring, a background check is done so that e.g. the minimum employment age according to national law in the country are to be observed.
- Employees under the age of 18 should not be allowed to perform hazardous work tasks.
- Bulten does not accept that candidates or employees have to pay recruitment costs or similar, this also applies to suppliers.
- 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 the manager or the 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. Bulten does not accept recruitment agencies to charge candidates any recruitment/hiring costs. All employees who join us are subject to checks in compliance with national laws to ensure they are genuine applicants.

### Living Wage

Bulten’s working hours, wages and overtime are in compliance with national laws and the laws in all countries where we conduct business. All our employees are paid at least the National Minimum Wage or so called living 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>

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 importance of working against modern slavery and human trafficking.

### **Approval**

This statement has been approved by Bulten group Executive management. The statement and policies will be reviewed annually.

Signed:	
Managing Director:	Lianne Brown
Date:	23 . APR . 24

This statement has been reviewed and updated from the 2023 published version.