

STATEMENT ON MODERN SLAVERY

Introduction

Bulten Ltd, and Bulten Group as parent company, 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 2018.

Organisational Structure and Business

Bulten Ltd is part of the Bulten Group and our parent company is Bulten Fasteners AB based in Gothenburg, Sweden.

Bulten Ltd imports and exports fasteners for the automotive industry. Bultens external suppliers have committed to follow and act according to UN Global Compact 10 principles. Bulten conduct an assessment initially with new and potential suppliers which they have to pass in order to become a supplier. Bulten then conduct assessments regularly on current suppliers and has a SQA organisation (Supplier Quality Assurance) that works to develop and follow up our suppliers. This is included in all terms and conditions we issue with our suppliers, business partners and service partners.

Based on this there is a low 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.

An annual sustainability report is now conducted for the Group as part of the Annual report from 2017 and will be reviewed on an annual basis. The 2017 Annual report with Sustainability report can be found at <http://mb.cision.com/Main/405/2500205/825350.pdf>

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. The Bulten Group's Code of Conduct policy and this statement can be found at <http://www.bulten.com/en/About%20Bulten/Sustainability>

Bulten Ltd.

ADDRESS
Unit 25, Bloom Lane
Normanby Enterprise Park
Scunthorpe DN15 9AJ
Great Britain

REGISTERED OFFICE
24 Great King Street
Edinburgh EH3 6QN

WEBSITE
www.bulten.com

PHONE
+44 1724 852 666

FAX
+44 1724 749 401

REGISTERED OFFICE IN
SCOTLAND

REG NO. 85664

In Q4 of 2017, a Global HR policy was introduced which guides all local policies and procedures.

Recruitment

All our recruitment takes place through reputable agencies, recruitment websites or through direct advertisements internally. All employees who join us are subject to checks in compliance with UK laws to ensure they are genuine applicants.

Living Wage

Bulten Group's and Bulten Ltd 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 Living Wage and reviews are regularly carried out to ensure we meet this standard

Reporting of any concerns


All employees and members of the board of directors of Bulten have an individual responsibility to report conflicts of interest, and breaches or infringements of this Code of Conduct. Any reports should be made to the immediate manager or his/her superior or according to local reporting procedures. If there are any questions on the reporting procedures and/or the interpretation of the policy, employees and managers can contact the SVP HR & Sustainability. Bulten will not accept any discrimination or reprisal against employees who report a suspected infringement 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.

Approval

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

Signed:	
Finance Director:	Lianne Brown
Date:	25 th April 2018

This statement has been reviewed and updated from the 2017 published version.

Lianne Brown
Finance Director
Bulten Ltd
25th April 2018