



CROFT
Filters

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MODERN SLAVERY STATEMENT August 2020 - July 2021

A) ORGANISATION

This statement applies to Croft Filters Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year August 2020 to July 2021.

B) ORGANISATIONAL STRUCTURE

Croft Filters Ltd is a UK leading manufacturer and supplier of custom filtration solutions with one centralised office. The Organisation's office location is 2 Beech Court, Taylor Business Park, Risley, Warrington, WA3 6BL.

The main activity carried out by the Organisation is the manufacture and sale of custom filtration solutions. Typical products include: filter cones, baskets and strainers, perforated panels and mesh products. All of which are custom tailored to the customer's requirements. Croft supply a range of different industries such as: Oil and Gas, Food and Drink and Energy, amongst others. Demand throughout the year follows no seasonal pattern, due to the constant nature of the supplied industries.

All operation and management of the Organisation is carried out in Warrington, United Kingdom.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not have a turnover of above £36 million, hence it is not required to publish an annual modern slavery statement. However, as a conscientious company, the Organisation takes a step further than needed to prevent modern slavery in its business and its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or

compulsory labour. No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to the supply of materials (metal wire mesh and plate) from various suppliers in Europe, North America and Japan.

F) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist within the activities of the suppliers and their suppliers of the raw material. This is because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be extremely low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) IMPACT OF COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above. The Organisation experienced no change in the means to operate during the COVID-19 pandemic, it simply applied the Government's guidelines to manage the pandemic's risk.

During the pandemic, the Group's employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, the Organisation's employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

The Organisation modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

H) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Review suppliers on a regular basis, contacting them in the event that the supplier is, or is suspected, to be involved in modern slavery.
- Undertake impact assessments of its services upon potential instances of slavery.
- Follow action plans to address risk to modern slavery.
- Ensure clear actions taken to embed a zero tolerance policy towards modern slavery.

I) KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- Being an SME allows for additional transparency within the Organisation. Employees are encouraged to report on any potential failings when following the steps to prevent modern slavery.

J) POLICIES

The Organisation has the following policies which further define its stance on modern slavery.

Croft Filters Ltd recognise that Modern Slavery is a crime and a violation of fundamental human rights. We are aware that Modern Slavery takes various forms, including 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. Croft encourage all staff members to monitor the risks of modern slavery, both internally and externally. Reporting on any potential risks or failings.

K) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery. Written guidance on modern slavery with the facilities to conduct further reading into the any changes in the Modern Slavery Act.

L) SLAVERY COMPLIANCE OFFICER

Neil Burns, Director at Croft Filters Ltd, will be the contact for all concerns regarding modern slavery, and who will then undertake relevant action with regard to the Organisation obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval...13/07/2021...

Signed.....

Director at Croft Filters Ltd

Date.....