

Modern Slavery (Anti-Slavery and Human Trafficking) Statement 2023/24

About Alexander Comley LTD

[Alexander Comley LTD](#) is a UK based, globally exporting, CNC manufacturing supplier of pressure retaining, turned parts for the Oil & Gas, Nuclear/Utilities and Marine industries. It has global distribution agreements in key country markets worldwide

A part of the wider Evenort Group, the Alexander Comley LTD employs over 20 staff directly and through our day to day operations, we also engage with numerous third party suppliers of goods and services

Our commitment to the principles of the Modern Slavery Act 2015

Alexander Comley LTD are committed to the principles of the Modern Slavery Act 2015. Through this statement, we acknowledge a role we may play in in the abolition of modern slavery and human trafficking

Modern slavery is a crime and a violation of fundamental 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.

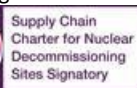
Alexander Comley LTD have a zero-tolerance approach to modern slavery. We are committed to acting ethically, with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in the business, wider group or supply chain.

The business is an equal opportunities employer, committed to creating and ensuring a non-discriminatory and respectful working environment for staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

T: +44 (0) 1384 401 080 | F: +44 (0) 1384 273 935 | E: sales@alexandercomley.com | W: www.alexandercomley.com

Registered Name: Alexander Comley Ltd | Registered in England: 108 654 46 | VAT reg No: 273 892 561



We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

We acknowledge, as a purchaser of goods and services, the opportunity to shape and influence good practices in the employment of people by other organisations exists

We provide awareness to staff of the [Modern Slavery Act 2015](#) and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking

We ensure staff involved in procurement activities are aware of and have access to information from gov.uk on [modern slavery](#) guidance

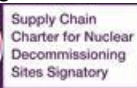
Here are the steps the business has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

Our supply chain

Due to the nature of our business, we assess ourselves to have a relatively low risk of modern slavery in our business and supply chains.

We procure goods and services from the UK and limited numbers of overseas suppliers. Supply chain companies must hold ISO9001 to be on our approved vendor list

We may require organisations tendering to work with Alexander Comley LTD to confirm that they have fulfilled their statutory requirement to have produced a modern slavery statement if they meet the criteria to do so.



Our policies which relate to the Modern Slavery Act 2015

The following policies are available to all staff digitally or as a hard copy:

- Core values and code of conduct
- Recruitment and selection
- Whistleblowing
- Disciplinary
- Bullying and harassment
- Diversity and inclusion

Due Diligence

Through undertaking due diligence in our activities;

- We seek to ensure that we do not inadvertently support modern slavery. We make our processes known to potential suppliers and staff as a means of encouraging good practice.
- We ensure that all staff are legally entitled to work in the UK and that the contract is directly with them.
- We ensure that any recruitment agency we may use, temporary or permanent staff, follows requirements to confirm the identity and right to work in the UK of individuals placed with us.
- We will further review procurement processes to further embed checks on suppliers ensuring compliance with the requirements of the Modern Slavery Act 2015
- We ensure staff are appropriately understand possible signs of modern slavery when engaging with the stakeholders
- We ensure, when undertaking review(s) of Human Resource (HR) policies, they include the consideration and prevention of risks of engagement with people and/or groups through modern slavery.
- We ensure staff involved in procurement activities have access to current information modern slavery (examples of; see *Useful Sources of Information*)

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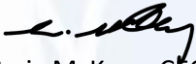
Breaches of the policy

Any employee who is found to have breached the policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct

Useful Sources of Information

- Walkfree Foundation's guide, '[Eradicating Modern Slavery](#)'
- Ethical Trading Initiative's '[The Human Rights Due Diligence Framework](#)'
- The United Nations (UN) '[Guiding Principles on Business and Human Rights](#)'
- The International Financial Corporation (IFC), CDC Group Plc, the European Bank for Reconstruction and Development (EBRD) and the UK Department for International Development (DFID); A Good Practice Note: '[Managing Risks Associated with Modern Slavery](#)'

This statement has been approved by Craig McKay, CEO, The Evenort Group, is reviewed annually and published in line with section 54(1) of the Modern Slavery Act 2015.

 01.08.2023
Craig McKay – CEO, The Evenort Group, Co MD, Alexander Comley LTD

