Gripple Ltd: Anti-Slavery and Human Trafficking Statement



This statement sets out the steps that we Gripple Limited (Gripple) have taken to prevent modern slavery and human trafficking occurring within any part of our business or supply chain during the financial year ending 31 December 2023, and intend to take in the coming year, and is made pursuant to the Modern Slavery Act 2015.

Gripple structure

Established in 1989, Gripple is the UK-based company of the following subsidiaries:

- Gripple Inc
- Gripple Europe SARL
- Gripple GmbH
- Gripple Hanger & Joiner Systems (India) Private Limited
- Gripple Spolka z ograniczona odpowiedzialnoscia (Ltd)
- Gripple Canada Inc
- Gripple Automation Limited
- Gripple PTY Limited
- Gripple Australia PTY Limited
- Gripple Japan Kabushiki Kaisha

We are a market leader in wire joiners/tensioners and wire rope hanger systems, designed to suit a whole range of applications across the agricultural, construction, solar, rail and infrastructure markets. Our patented products are designed and manufactured across six sites in South Yorkshire, UK, and our subsidiaries offer further manufacturing, warehousing, and office facilities.

We are an employee-owned business and operate within the GLIDE group of companies, which is a group of employee-owned businesses.

Our commitment

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Steps

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

We have not, to our 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, we have taken the following steps to ensure that modern slavery is not taking place:

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- We ensure that all new suppliers are onboard in accordance with company policy. All new suppliers complete a supplier questionnaire and ensure they read, acknowledge, and accept this statement, with responses stored and monitored as part of on-going risk management.
- We regularly complete risk assessment across our supply chain, this is completed as a minimum annually.
- We have revised our audit process to ensure that it is robust and able to highlight areas of risk within our supply chain.
- We continue to map our supply chain tier 1 and tier 2 suppliers to monitor potential risk areas in our supply chains.
- We continually refer to www.global-slavery-index to identify which countries are deemed high-risk of modern slavery.
- We ensure that our recruitment process is robust and all due diligence checks are recorded, including checking identification and right to work documents, and cross checking for duplicated personal details such as bank accounts, home addresses and phone numbers.
- We will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- We adopt a proactive approach to ensure that all employees know how to report suspicions of hidden worker exploitation via awareness training.
- We continue to deliver mandatory awareness training to those in a management role and to deliver to all employees across the business, which includes adding training slides to our internal learning platform, GeniUS, which is accessible to all employees.
- We protect whistleblowers in line with our Whistleblowing Policy.

Our next steps are as follows:

- We will form a working group to tackle modern slavery and human trafficking which includes staff from different functions around the business.
- We will complete further risk assessments of all suppliers as part of our onboarding process to identify where there could be risks of modern slavery. This will include both direct & indirect suppliers, including contractors, to identify low, medium, and high-risk suppliers.
- We will commit to auditing our high-risk suppliers within the year.
- Having mapped out our supply chain, we are now working to apply risk factors to this information to address any high-risk areas.
- We will ensure that modern slavery training is tailored to be role specific, capturing procurement, human resources and facilities as areas where the risk of modern slavery is more prevalent.
- We will train all relevant staff who visit suppliers to spot the signs that may indicate worker exploitation.
- We will provide a clear escalation process for the procurement team to follow should any supplier not comply with this statement.
- We will provide information on tackling 'hidden labour exploitation' to our workforce via a variety
 of formats such as workplace posters, worker leaflets, induction, and other training.

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Policies

Gripple has the following policies which further define its stance on modern slavery:

- Anti-slavery and Human Trafficking Policy
- Statement of Ethics and Code
- Recruitment Policy Notice & Procedure
- Whistleblowing Policy

This statement was approved by the Board of Directors on 7 May 2024 and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gripple Limited and its subsidiaries anti-slavery and human trafficking statement for the financial year ending 31 December 2023.

Edward Stubbs

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Gripple Limited Group Management Director