



Policy and Statement on Modern Slavery

Modern slavery is a crime and a reprehensible 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. LTi Metaltech ("the Company") has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

LTi Metaltech and the Supply Chain

- LTi Metaltech is a company that specialises in precision fabrication and welding for highly regulated industries. As such, we are required to meet the stringent standards demanded by businesses within Fusion & Nuclear, Healthcare and Renewables.
- In line with this, the provision of all materials is subject to clear materials traceability requirements and may be subject to audit by us at any time.
- 90% of our materials are supplied from companies within the UK, 8% from within Europe and 2% from China.
- The countries that our suppliers are based in are considered to have a low prevalence of modern slavery based on the Global Slavery Index. Whilst that allows us some confidence, we do request reassurance from our supply chain that neither they, nor their own suppliers, are in breach of the Modern Slavery Act.
- We establish a relationship of trust, integrity and partnership with our suppliers and include due diligence and auditing of their compliance with Health & Safety, industry and operating standards.
- Should we be made aware of any substantiated allegations of human trafficking or slavery activities against any of our suppliers, we would act immediately against the supplier and report the organisation to the relevant authorities.

Responsibility for the policy

The Company has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

Compliance with the policy

All employees must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control and they are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If any of those individuals believe or genuinely suspect that a conflict with this policy has occurred or may occur in the future, they are required to notify their line manager or a Company Director at the earliest opportunity. They are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage. If anyone were to believe or suspect a breach of this policy has occurred or that it may occur, they must notify their line manager or company Director OR report it in accordance with our policy on Public Interest Disclosure (Whistleblowing) as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains. If anyone is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager or Company Director.

LTi aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Anyone believing that they have suffered any such treatment should inform their line manager immediately. If the matter is not remedied, and the individual is an employee, they should raise it formally using our Grievance Procedure, which can be found in the current Employee Handbook

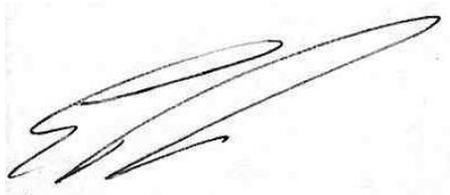
In addition, LTi Metaltech is keen to educate all employees on modern slavery issues and to provide training as part of our induction programme. This is to ensure that all employees are aware of warning signs for potential cases of slavery or human trafficking and the procedure for reporting any concerns that they may become aware of.

This Modern (Anti) Slavery Policy and Statement is intended to ensure awareness of the risk LTi Metaltech faces from modern slavery within our supply chains. This will form part of the induction process for all individuals who work for us, and updates will be provided as appropriate.

- Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

As required by the UK government, it is the intention of the Company to review this statement on an annual basis in line with our financial year end.

Signed by:

A handwritten signature in black ink, appearing to read 'Edgar Rayner', is written over a light grey rectangular background. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Edgar Rayner, Managing Director, LTi Metaltech Ltd