

## Modern Slavery Statement

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**Financial Year: 2025/2026**

### Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015, It outlines the steps that Calder Industrial Materials Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery includes slavery, servitude, forced labour and human trafficking. Calder has a zero-tolerance approach to all forms of modern slavery. We are committed to acting ethically, with integrity and transparency in everything we do.

### Our Commitment

We are committed to ensuring that modern slavery and human trafficking are not present in any part of our operations or supply chain. Our approach includes:

- Ethical sourcing: We work with trusted suppliers and expect them to uphold the same high standards.
- Safe working conditions: We provide a safe, respectful and fair working environment for all employees.
- Training and awareness: We are developing training to help our teams recognise and report any concerns.
- Policies and controls: We are strengthening our internal systems to prevent and detect any risks of modern slavery.

We will continue to review and improve our practices to ensure we meet our responsibilities and support ethical business across our industry.

### Our organisation

Calder Industrial Materials Ltd is a leading supplier of lead sheet and specialist lead engineering products to the roofing, healthcare, aerospace, defence, industrial, marine, oil & gas and research markets. The manufacturing of our products takes place in two factories on the same site in Chester, UK.

Our supply chain includes suppliers of lead ingots, as well as suppliers of transportation, energy, and employment agency services.

We are a member of Calder Group, Europe's largest producer of lead sheet and lead, based engineered products with operating subsidiaries in Germany, France, Netherlands, Ireland and the UK.

### Risk assessment

We have assessed the risks to our prevention of Modern Slavery according to their impact and likelihood of occurrence. The highest risk areas have been assessed as:

- Recruitment of full-time employees
- Our use of occasional agency staff
- The use of suppliers of lead and transportation services

### Due diligence and Training

Our recruitment process includes:

- Eligibility to work checks
- Identification checks - Right to work checks, appropriate at each stage
- Occupational health checks
- Health and safety induction
- Reference to modern slavery is in our Company Handbook

We use the Home Office's Modern Slavery Awareness booklet to support staff awareness.

All payroll is paid directly into bank accounts in the name of the employee.

Temporary staff are recruited through local agencies known to us, who have been evaluated for their policies and commitments on modern slavery.

## Modern Slavery Statement

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### Our suppliers

Calder Industrial Materials operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence can include site visits which include a review of working conditions.

In addition to the above, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- UK based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate)
- International suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations
- We may remove them from our approved supplier list at any time should any instances of modern slavery come to light

### Key performance indicators

We know the steps we are taking to prevent Modern Slavery are being effectively implemented if internal auditing reveals:

- All recruitment is fully compliant with our policies and procedures
- All employees are paid to bank accounts clearly in the name of the employee
- Auditing of some of our main suppliers confirms the existence of a Modern Slavery statement compliant with the requirements laid out in UK Government guidance
- No reports are received from employees, the public or law enforcement agencies that would indicate any Modern Slavery occurrences in our business, or causes for concern
- Ongoing monitoring and improvement of our practices

### Approval for this statement

This statement was approved by the Managing Director on 07-11-25

Name: **Paul McKeon**  
Managing Director

Signature:



Date:

07. 11. 25

*Next review date: June 2026*