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## Modern Slavery Statement

Sigma ASL Ltd Disclosure Statement under the Modern Slavery Act 2015 for the year ended 31<sup>st</sup> December 2019.

### Introduction

This statement explains the steps that Sigma ASL are taking to ensure that slavery and trafficking do not take place in any of its supply chains, or in any part of its own business.

Sigma ASL recognises that it has a responsibility to take a robust approach against slavery and human trafficking.

Sigma ASL is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of Sigma ASL Ltd. Sigma ASL works closely with manufacturers in South Korea, China, India, Taiwan and Vietnam to provide OEM and Tier 1 customers in the EU, USA, South America and the UK with Just in Time delivery of automotive, aerospace and lighting components, engineering expertise and supply chain services.

Sigma ASL actively seeks to do business with strategic supply partners who share Sigma ASL's focus on doing business responsibly. We work in close partnership with 22 direct suppliers and also collaborate with sub-suppliers across the supply chain.

Sigma ASL currently operates in the following countries:

- United Kingdom – Business Development, Engineering, Quality, Finance, Supply Chain and Administration.
- South Korea – Engineering, Supplier Liaison, Production Scheduling, Supply Chain and Quality.

### Relevant policies

- **Code of conduct** Sigma ASL's code makes clear to employees the actions and behaviour expected of them when representing the organisation. Sigma ASL strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.
- **Corporate Social Responsibility Policy** Sigma ASL recognises that social, economic and environmental responsibilities to our stakeholders are integral to our business. We aim to carry out these responsibilities proactively and decisively and communicate them clearly through our corporate policies.
- **Social & Ethical Policy** This policy communicates Sigma ASL's expectations in relation to the ethical treatment of employees, customers, associates, contractors, suppliers and the public. The policy extends beyond Sigma ASL's direct dealings with people to include the social impact of its activities.
- **Supplier Code of Conduct** Under the terms of Sigma ASL's Supplier Code of Conduct, Sigma ASL is permitted to audit its suppliers' compliance with the Code. In cases where serious risks are presented, these audits may be immediate and unannounced. Sigma ASL monitors its supply chains for compliance with the Supplier Code, however, such monitoring is not focused solely on human trafficking or slavery. If necessary, Sigma ASL may choose to engage third parties to evaluate compliance with human trafficking or slavery laws. Sigma ASL will promptly and thoroughly investigate any claims or indications that a supplier may be engaging in human trafficking or slavery, or is otherwise not complying with Sigma ASL's Supplier Code of Conduct.
- **Whistleblowing policy** Sigma ASL encourages all its workers, customers and other business partners to report any concerns related to the activities of the organisation or its supply chain. This includes any

circumstances that may give rise to an enhanced risk of slavery or human trafficking. Sigma ASL's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Anti Bribery & Corruption Policy** Sigma ASL is committed to being fair and honest in its dealings with clients, customers and suppliers and adopts a zero tolerance approach towards bribery. The policy covers all personnel including permanent, temporary, agency staff and contractors.
- **Equal Opportunities Policy** Sigma ASL's aim is to ensure that all of its employees and job applicants are treated equally irrespective of disability, race, colour, religion, nationality, ethnic origin, age, sex, sexual orientation or marital status

## Due Diligence Processes

Sigma ASL representatives are in direct and regular contact with our suppliers, and make recorded visits to supplier sites and offices on an annual basis. New and potential supply partners are subject to a rigorous audit before a trading relationship is established. Through the inclusion of a modern slavery section within our annual audit, Sigma ASL seeks to ensure that its suppliers are committed to preventing slavery and human trafficking in their activities.

## Risk Assessment

Sigma ASL appreciates that the risk of involvement in modern slavery through the supply chain increases as supplier and sub-contracting chains grow. There is also the potential that organisations within the supply chain may engage in work of a dangerous or physically demanding nature.

According to the Global Slavery Index, India is ranked 53<sup>rd</sup> out of 167 countries with an estimated 6.1 people out of 1000 living in modern slavery.

These identified risk factors are taken into account in Sigma ASL's due diligence plans. By July 2021, a bi-annual audit programme will be in place for Indian suppliers, and by July 2021 sub-supplier levels of the supply chain will be included in the annual collection of modern slavery statements.

## Measuring Effectiveness

Sigma ASL representatives are in direct and regular contact with our suppliers and make recorded visits to supplier sites and offices on an annual basis. Annual audits are carried out with each supplier, including the collection of information relating to human trafficking and slavery, and a record is maintained against our expectation of zero instances of modern slavery. The results of these audits are recorded in a central database for easy retrieval, reporting and measurement.

## Training for Staff

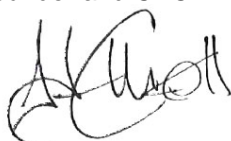
Sigma ASL ensures that all employees are trained annually with respect to expectations set out in Sigma ASL's Code of Conduct and Social & Ethical Policy. In addition, ongoing training for employees engaged with Sigma ASL's supply chain is provided with specific content focusing on recognizing and mitigating risks of slavery and human trafficking.

## Director Approval:

Name: Tony Elliott

Position: Founder and CEO

Signature:

A handwritten signature in black ink, appearing to read 'Tony Elliott', written over a light blue horizontal line.