

Statement about modern slavery and human trafficking

Introduction

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.

We are committed to improving our practices to combat slavery and human trafficking.

CTN Group is not required to make a formal Modern Slavery Declaration under the terms of s.54(1) of Modern Slavery Act (2015), but as a good practice, and to facilitate the declarations and/or audits of our customers, we are making the following statement.

Organisational structure

Our Group is comprised of multiple engineering sites located across the south of England. Each site recruits staff separately, with very few individuals working across multiple sites. In total, our sites employ some 40 members of staff, including engineers, inspectors, drivers and administrators.

We are committed to paying all of our staff at a level higher than the prevailing living wage.

We have policies in place to support staff during absence from work due to sickness (including absence due to self-isolation because of household infection from COVID-19).

Our business activity

Our principal business activity is the manufacturing of small and medium-sized components for a range of UK-based and international engineering purposes. We supply components for aerospace, motorsport, medical, scientific, oil & gas, and other commercial sectors.

Our supply chain

Our supply chain consists of raw material suppliers (predominantly UK-based stockholders of metal and plastic in various forms) and post-process sub-contractors (UK-based manufacturing sites that undertake some form of finishing, such as plating or anodizing, on parts we have manufactured). **We do not consider our supply chain to be at high risk of labour practices that might amount to modern slavery or that might facilitate human trafficking.**

Our largest UK suppliers make Declarations of their own with respect to modern slavery and human trafficking. When procuring raw material from new suppliers, including from suppliers outside of the UK, we undertake reasonable due diligence to review relevant labour practices. With respect to our sub-contractors, we encourage longstanding relationships and make clear our commitment responsible corporate behaviour.

If members of staff (whether during procurement due diligence or during occasional site visits) have concerns about the labour practices of a supplier or sub-contractor, they are encouraged to report their concern to a Manager or Director. We are committed to taking appropriate action to report concerns of unlawful activity to relevant authorities, but will also consider ending commercial relations with suppliers whose conduct, though legal, does not meet our vision of responsible or ethical corporate behaviour.

For the purpose of our ISO:9001 and AS:9100 compliance, where applicable, we maintain careful record-keeping and traceability of parts for our customers, including the source of the material and the provider of any external processing. Details of these records can be supplied to customers routinely or upon request.

Training

Due to the fact that our industry is considered low-risk in relation to modern slavery or human trafficking, no training has been undertaken other than making this Statement available to employees and suppliers. We will, however, periodically review this requirement.

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