

Approved by:  M.N. Stansfield Managing Director	 United Kingdom Human Resources Policy	NMB-HR-POL067 Effective Date: 08.04.2019
---	---	--

Subject: Slavery and Human Trafficking Statement – Modern Slavery Act 2015

Iss1	Original Issue	31 March 2016	C Bennett
Iss2	Annual review & change to corporate name & logo	31 March 2017	C Bennett
Iss3	Annual review	31 March 2018	C Bennett
Iss4	Amended to include statement on 'end of fiscal year'	31 Oct 2018	C Bennett
Iss5	Annual review	8 April 2019	C Bennett

The **Modern Slavery Act 2015** came into effect on 29th October 2015. This law requires manufacturers and retailers doing business in the UK which supply goods or services and have an annual turnover exceeding £36 million to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

NMB-Minebea UK Ltd (*the Company*) is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain

This annual statement is made and published upon conclusion of the 2018/2019 fiscal year (31st March 2019) and pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps the company has taken and shall continue to take to ensure that modern slavery or human trafficking is not taking place within our company or supply chain.

This annual statement shall be reviewed annually and published on or before 31st March of each fiscal year end.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. **NMB-Minebea UK Ltd.** has a zero tolerance approach to any form of modern slavery.

The Company:

NMB-Minebea UK Ltd. part of the 'MinebeaMitsumi Group' of companies, is situated two (2) miles west of Lincoln, England and forms part of the Rod End & Spherical, Fastener Business Unit dedicated to the design, manufacture and supply of self aligning rod end and spherical bearings for the worldwide aerospace, industrial and automotive sectors.

Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based. These procurement activities include raw material suppliers and sub-contract processors, typically engaging with over 130 supplier's (20 raw material [90% of raw material purchases) and 25 sub-tiers [80% of sub-tier purchases])

Policies & Procedures

The Company operates a number of internal policies to ensure we are conducting business in an ethical and transparent manner, these include (but not limited to):

1. Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Code of Business Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

3. MinebeaMitsumi Group Code of Conduct. This code explains the measures for compliance with Labour, Health & Safety, Environment and Ethics & Business Practice for the Group Companies in addition to any company site specific policies & procedures.
4. Corporate Social Responsibility Policy. This policy sets out how we look to integrate our business values and operations to meet the expectations of our stakeholders - who include our customers, employees, investors, suppliers, the community and the environment.
5. Anti Bribery. This policy sets out the company position on any form of bribery and corruption and provides guidelines aimed at ensuring compliance with laws, rules and regulations as well as enabling employees and persons associated with the company to understand associated risks whilst providing secure means of reporting incidences.
6. Public Interest & Disclosure Policy. This policy and procedure is to provide safeguards to enable employees to raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Supply Chain

The Company operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier whilst conducting annual surveys to report on their processes and due diligence taken to ensure that they and their supply chains remain compliant.

In addition to the above, as part of our contract with suppliers, we shall set out to ensure they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

This fiscal year ending we have surveyed 116 suppliers and received 54 responses with statements of compliance.

Third Party Audits

As part of our contract with suppliers, we undertake regular site audits to monitor compliance with company expectations and legal requirements, which includes a review of working conditions. We choose which facilities to audit based upon performance and risk assessments and if any issues are identified during an audit the supplier is required to prepare a corrective action plan and resolve all violations within an agreed and monitored time period.

Training

The Company conducts a range of training initiatives, including but not limited to induction, vocational and on-line training for employees and covers our General Rules and the importance of acting with integrity and in line with our own internal Integrity and Conduct code.

Our procurement/buying team understand their obligations relating to modern slavery and what to do if they suspect that it is taking place within our supply chain.

Violation

The Company disciplinary policy permits the termination of employees found to be involved in any breach of the law banning forced labour, slavery and human trafficking.

NMB-Minebea UK Ltd. will continue to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

Approval for this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the **NMB-Minebea UK Ltd.** slavery and human trafficking statement.