



MODERN SLAVERY ACT - STATEMENT

INTRODUCTION FROM THE MANAGING DIRECTOR

Slavery and human trafficking remains a hidden blight on our global society. As a global business we have a responsibility to be aware of the risks, however minimal, to our business and our wider supply chain. Surface Technology International Limited therefore acknowledges total responsibility to the Modern Slavery Act 2015. This responsibility will continue to ensure transparency within the organisation, with suppliers and also with customers of products and services to STI Limited.

ORGANISATION'S STRUCTURE

STI Limited was acquired by IMI (a company listed on the Philippines Stock market) in 2017, through its subsidiary Integrated Micro-Electronics (IMI) UK Limited; they control an 80% stake of STI Limited. IMI is a leading provider of electronics manufacturing services (EMS), power semiconductor assembly and test services. STI Limited is part of AC Industrials, a wholly owned division of Ayala Corporation.

STI Limited offers its customers a full suite of bespoke electronic services and support via collaborative and proactive partnership. STI Limited comprises of 4 trading businesses: STI-Hook, UK, STI-Poynton, UK, STI-Cebu, Philippines, and STI-R& D. STI Limited currently employs approximately 900 staff members across multiple locations in UK, Europe and Asia. STI Limited maintains a full range of quality accreditations as well as an unsurpassed reputation in Defence and Aerospace and other high reliability market sectors.

OUR BUSINESS

Our business is focused on serving the supply requirements of leading global organisations primarily in the following markets: Defence, Civil and Military aerospace, Oil and Gas exploration, Space, Communications, Industrial, Commercial, Automotive and Medical devices.

OUR SUPPLY CHAINS

STI Limited has a global procurement team (Hook, Poynton and Cebu) with a circa £60m plus current annual spend across all materials for full product builds. Our supply chain is global however this is controlled through our main Hook site which allows the UK site to maintain full visibility of our supply chains. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our supply chain will be subject to initial and ongoing assessments to check their compliance to this Act. If STI Limited become aware of a supplier not in compliance with this Act, they will be removed from our approved vendor list.



OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Our stance on modern slavery and human trafficking is clearly demonstrated not only through our Anti-Slavery and Human Trafficking Policy but also within our Equal Opportunities Policy, our Dignity at Work Policy and our Anti Bribery Policy. These key policies reflect and uphold our stance towards modern slavery and human trafficking.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, we monitor our key supplier's performance regularly against Key Performance Indicators (KPIs) and a dedicated Supplier Relationship Manager (SRM) is allocated to each of our key suppliers. All suppliers are audited on their own position to modern slavery and human trafficking. We build long standing relationships with local suppliers and tenancy customers. We have the following processes in place to ensure compliance with the Modern Slavery Act 2015:

- Evaluating the modern slavery and human trafficking risks of each new supplier, we undertake a full review of all new suppliers requiring their written compliance to the Modern Slavery Act 2015 via our detailed Supplier Questionnaire
- Reviewing on a regular basis all aspects of the supply chain via regular performance reviews and conducting key supplier audits and assessments
- Communicating our stance on modern slavery and human trafficking to all our suppliers and customers
- Communicating our Anti Slavery and Human Trafficking Policy to employees, suppliers and customers

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to modern slavery and human trafficking. We expect all those in our supply chain to comply with and uphold these values. All suppliers and customers are verified before we begin a relationship with them and our key suppliers are reviewed in every business quarter against defined criteria, which includes committing to the same business standards we ourselves uphold. Where applicable, we also carry out necessary supplier audits.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking we provide training to relevant members of staff. All Directors and Supply Chain Managers have been briefed on the subject and this information is then flowed down to their teams. We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of the organisations Anti-Slavery and Human Trafficking Policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to identify any slavery and human trafficking within our business and supply chains.



OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Slavery and human trafficking is unacceptable to us. We promote every activity possible within our business to ensure that no modern slavery or human trafficking is present. We are committed to upholding the law set within the Modern Slavery Act 2015 and will look to continually improve our understanding and tracking of this as a business.

Simon Best
Managing Director

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for financial year 1st June 2018 to 31st May 2019.