# **Gripple Ltd: Anti-Slavery and Human Trafficking Statement**



This statement sets out the steps that Gripple Limited (referred to in this statement as 'the Organisation') and its subsidiaries (Gripple) have taken to prevent modern slavery and human trafficking occurring within any part of their businesses or supply chain during the financial year ending 31 December 2024, and intend to take in the coming year, and is made pursuant to the Modern Slavery Act 2015.

### **Organisational structure**

Established in 1989, the Organisation is the UK-based parent company of the following subsidiaries:

- Gripple Inc
- Gripple Europe SARL
- Gripple GmbH
- Gripple Hanger & Joiner Systems (India) Private Limited
- Gripple Spolka z ograniczona odpowiedzialnoscia (Ltd)
- Gripple Canada Inc
- Gripple Automation Limited
- PMS Diecasting Limited
- Gripple PTY Limited
- Gripple Australia PTY Limited
- Gripple Japan Kabushiki Kaisha

It is the market leader of wire joiners/tensioners and wire rope hanger systems, designed to suit a whole range of applications across the agricultural and construction, solar, rail and infrastructure markets. Our patented products are designed and manufactured across seven sites in South Yorkshire, UK, and our subsidiaries offer further manufacturing, warehousing, and office facilities.

The Organisation is an employee-owned business and operates within the GLIDE group of companies, which is a group of employee-owned businesses.

#### **Our commitment**

We are dedicated to ensuring that modern slavery and human trafficking have no place within our business operations or supply chains. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to ethical conduct and integrity across all business relationships. We are committed to implementing and maintaining effective systems and controls to prevent slavery and human trafficking at every level of our supply chain.

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#### **Actions taken**

To ensure compliance with our commitment, we have established due diligence processes, including the review and monitoring of supplier controls. To our knowledge, we have not engaged in business with any organisation involved in modern slavery or human trafficking.

In line with Section 54(4) of the Modern Slavery Act 2015, the following measures have been undertaken:

- Supplier selection and risk assessment: We apply a weighted and risk-based supplier selection process that considers geographic risk factors associated with modern slavery.
- Use of Global Slavery Index: We continuously consult the Global Slavery Index to identify and monitor countries at high risk of modern slavery.
- Cross-functional steering committee: We have established a cross-functional steering committee responsible for overseeing our efforts to combat modern slavery and human trafficking, promoting vigilance and driving proactive initiatives
- Supplier onboarding: All new suppliers are required to complete a supplier questionnaire, acknowledge this statement, and are onboarded in accordance with our company policies. Supplier responses are stored and monitored as part of our ongoing risk management.
- Supplier declarations: Where applicable, suppliers must provide their own anti-slavery statements.
- Annual risk assessments: We conduct regular risk assessments (at least annually) across our supply chain to identify high-risk suppliers, followed by on-site audits where necessary.
- Enhanced audit process: Our audit process has been revised to include checks for areas of risk, such as reviewing employee data on age, minimum wage compliance, and holiday entitlements.
- Robust recruitment processes: We conduct thorough due diligence checks during recruitment for all workers, including verifying identification, right-to-work documentation, and cross-checking for duplicated personal information (e.g., bank accounts, addresses, phone numbers).
- Awareness training: We proactively educate employees on recognising and reporting hidden exploitation, and deliver mandatory training to all management and employees via our internal learning and development platform.
- Whistleblower protection: We protect whistleblowers through our Whistleblowing Policy.

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### **Future steps:**

Looking forward, we are committed to strengthening our efforts by:

- Continuing supplier risk assessments during onboarding to identify potential modern slavery risks.
- Including both direct and indirect suppliers (e.g., contractors) in risk assessments, categorising them as low, medium, or high risk.
- Applying risk factors to mapped supply chain data to address vulnerabilities.
- Delivering role-specific modern slavery training, particularly for procurement, HR, and facilities teams, with senior managers responsible for maintaining training records.
- Auditing high-risk suppliers within the year, utilising accredited external auditors where necessary.
- Training supplier-facing staff to identify and act on signs of exploitation.
- Establishing a clear escalation process for non-compliant suppliers within the procurement team.
- Promoting awareness of hidden labour exploitation through various formats at induction and during ongoing employee training

### **Related policies**

We have established several policies that further define and reinforce our stance against modern slavery:

- Anti-Slavery and Human Trafficking Policy
- Statement of Ethics and Code of Conduct
- Recruitment Policy & Procedure
- Whistleblowing Policy

This statement was approved by the Board of Directors on 6 May 2025 and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Gripple Limited and its subsidiaries anti-slavery and human trafficking statement for the financial year ending 31 December 2024.

Date 6 May 2025

**Edward Stubbs** 

**Gripple Limited Group Managing Director**