

# Modern Slavery and Human Trafficking Statement

Batt Cables Ltd · Financial year ended 31/12/2026

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Batt Cables Ltd slavery and human trafficking statement for the financial year.

*This statement has been approved by the Board of Directors of Batt Cables Ltd and is signed on its behalf by a director.*

## 1 · Introduction

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Batt Cables Ltd is committed to conducting its business ethically, responsibly and with integrity. We recognise our responsibility to respect human rights and to prevent modern slavery, human trafficking, forced labour, bonded labour and other forms of exploitation, both within our own operations and within our supply chains.

We operate a **zero-tolerance approach** to modern slavery and human trafficking. We take reasonable, proportionate and risk-based steps to identify, prevent and address these risks, working collaboratively with our employees, suppliers, customers and other stakeholders.

This statement sets out the steps we have taken during the financial year. We have written it to be honest about both our progress and the limits of what we can currently verify. **We do not claim that our supply chains are free from modern slavery** — we do not consider that any organisation can credibly make that claim. We set out instead what we have done, what we have found difficult, and what we intend to do next.

## 2 · Our structure, business and supply chains

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### 2.1 Our business

Batt Cables Ltd is a UK-based business that purchases, stock holds & supplies electrical cables & accessories from a network of three locations employing ~195 people across all locations.

As a business purchasing materials and products from overseas suppliers, we recognise that modern slavery risks can arise at multiple levels of international supply chains, including raw material extraction, processing, manufacturing, labour recruitment, transportation and subcontracted activity.

## 2.2 Our supply chains

Our supply base comprises 16 direct material suppliers. Our principal categories of purchase are finished cable products & accessories, packaging materials and logistics services from 3 providers. Our suppliers are located in 7 countries including the UK.

Certain characteristics of our supply base raise our assessed exposure to modern slavery risk. These include the use of migrant and agency labour in manufacturing, the presence of labour recruiters and employment intermediaries, the complexity and limited transparency of upstream tiers, and the prevalence of raw material extraction in regions where labour exploitation has been credibly reported.

## 3 · Our policies

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We maintain a **Modern Slavery & Human Trafficking Policy (BMS-POL-001)**, which was reviewed and approved by the Board during the reporting period. The policy sets out our commitments and applies to all employees, directors, agency workers, contractors, consultants, temporary labour providers, suppliers, overseas manufacturers, distributors, agents and intermediaries, logistics providers and subcontractors, and to other parties within our direct and indirect supply chains.

The policy commits us to the following specific positions:

- A prohibition on forced, bonded, trafficked and compulsory labour, and a requirement that employment is freely chosen.
- A prohibition on exploitative recruitment fees charged to workers, and a commitment to seek appropriate remedy where such fees have been imposed in connection with our supply chain.
- A prohibition on the confiscation or retention of passports, identity documents and other personal belongings as a means of restricting workers' freedom.
- A prohibition on unlawful child labour, and protection of young workers from hazardous or prohibited work.
- A requirement for lawful wages, working hours and working conditions.
- Recognition that migrant, agency, temporary and intermediary-recruited workers face increased risk of exploitation, and a commitment to consider these risks when assessing suppliers and labour arrangements.
- A statement that commercial considerations — including price, delivery and continuity of supply — will not override our responsibility to address credible modern slavery concerns.

The policy sits alongside our other relevant policies and procedures, including our whistleblowing policy, Quality Policy, Environmental Policy, Health & Safety Policy, procurement and supplier management processes, and recruitment procedures. It is integrated into our management system and supported by the governance arrangements set out in section 7 of this statement.

## 4 · Risk assessment

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We take a risk-based approach to assessing modern slavery risk across our supply chains. The extent of assessment is proportionate to the nature of the supplier relationship, the materials or services supplied, the country and sector involved, the sourcing arrangements and any known risk indicators.

### 4.1 What we assess

- Country of manufacture and country of origin of key raw materials.
- Industry specific 3<sup>rd</sup> party accreditations.
- Industry and commodity-specific risks.
- The use of migrant, temporary, agency or subcontracted labour.
- Reliance on labour recruiters or employment intermediaries.
- Supply-chain complexity and the transparency of upstream suppliers.
- The availability and credibility of supplier policies and controls.
- Previous allegations, audit findings, regulatory action or credible reports of exploitation.
- The supplier's willingness and ability to demonstrate effective controls.

### 4.2 Our assessed risk areas

Our highest rated suppliers per The Global Slavery Index are in Turkey. All 6 of these suppliers were partners prior to administration, all are certified to ISO 9001 & have been subjected to periodic reviews over numerous years of trading.

We note that a supplier's geographical location alone does not determine the outcome of an assessment. Decisions consider the available evidence and the circumstances of the supply chain & as such our confidence in these trading relationships remains high.

## 5 · Due diligence processes

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We carry out due diligence proportionate to assessed risk. The following processes were operated during the reporting period.

### 5.1 Supplier approval

New suppliers are required, where proportionate, to demonstrate that they understand and address modern slavery risks. Depending on assessed risk, this may include completion of a supplier self-assessment questionnaire, confirmation of compliance with applicable labour and human rights legislation, evidence of a modern slavery or ethical employment policy, disclosure of manufacturing locations and significant subcontractors, confirmation of controls relating to recruitment fees, identity

documents and worker freedom, disclosure of known incidents or material allegations, and acceptance of contractual requirements.

Suppliers that cannot provide sufficient assurance may be subject to additional checks, conditional approval or rejection, depending on the level of risk.

## 5.2 Contractual requirements

We incorporate modern slavery requirements into supplier terms and conditions & contracts along with sharing our policy & expectations. Our requirements include compliance with applicable modern slavery, employment and human rights legislation, prohibition of forced and bonded labour, prohibition of exploitative recruitment fees and unlawful deductions, retention of control over identity documents by workers, prohibition of unlawful child labour, provision of lawful wages and conditions, application of equivalent standards to subcontractors and labour providers, cooperation with due diligence requests and investigations, and reporting of material concerns.

## 5.3 Ongoing supplier management

Modern slavery risk is reviewed periodically for existing suppliers, with greater scrutiny applied to higher-risk relationships. Reviews may be triggered by changes in sourcing arrangements, new country-of-origin information, significant changes in supplier ownership, credible allegations, audit findings or other warning signs.

## 5.4 Supply-chain transparency

Where practicable and proportionate, we seek to improve visibility beyond our direct suppliers, particularly where key raw materials or manufacturing activities present elevated risk. We encourage suppliers to understand and monitor their own supply chains and to apply equivalent standards to their subcontractors and labour providers.

We recognise that supply-chain transparency is limited in some circumstances. Where this occurs, we assess the significance of the limitation and consider reasonable steps to obtain further information.

## 5.5 Verification and audits

Supplier assurances are assessed in proportion to risk and to the reliability of the information provided. Verification activities may include reviewing supplier documentation and declarations, reviewing independent audit reports or recognised certification evidence, conducting supplier meetings and structured assessments, requesting information on manufacturing sites and labour providers, conducting or commissioning supplier audits where justified, reviewing corrective action plans and evidence of implementation, and monitoring credible external information relevant to supplier risk.

**We recognise that documentation alone may not demonstrate that workers are free from exploitation.** Where significant risks exist, additional verification and worker-centred evidence may be required. During the reporting period we have used a combination of sharing our policy & reviewing the Global Slavery Index. Due to our long-standing relationships with suppliers that we have maintained

relationships with, we feel this is appropriate & does not present a significant risk. As our business grows, we will assess risks & instigate appropriate actions such as in-person supplier visits/audits.

## 6 • Training and awareness

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We provide modern slavery awareness training according to employees' responsibilities and their exposure to risk. Priority is given to personnel involved in procurement and supplier management, overseas sourcing and supplier approval, human resources and recruitment, contract management, compliance, risk management and internal auditing, and management oversight and reporting.

Training and awareness activity covers the indicators of modern slavery, supply-chain risk factors, supplier due diligence, reporting routes, incident escalation and the responsibilities established by our policy.

## 7 • Governance and responsibilities

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Accountability for our approach to modern slavery sits with the Board of Directors, which approves our policy and this statement, provides resources to manage identified risks, reviews material incidents and remediation actions, and ensures modern slavery risks receive appropriate management attention.

Operational ownership is allocated as follows: the **Procurement/Supply Chain Manager** is responsible for identifying and assessing supplier-related risk, incorporating modern slavery checks into supplier approval and ongoing management, maintaining due diligence records, conducting enhanced due diligence for higher-risk suppliers, monitoring corrective actions and escalating significant concerns.

The **TQM Manager** maintains the policy and coordinates its integration into our management system, ensures modern slavery risk is considered within business risk assessments, coordinates internal review and monitoring, supports the investigation of reported concerns, and coordinates preparation of this statement.

The **HR function** ensures our own employment practices support the policy, including employment checks, monitoring the use of agency workers and labour providers, ensuring employment terms and working conditions comply with applicable requirements, providing awareness training and maintaining confidential reporting routes.

**Reporting concerns.** Employees, suppliers, contractors and other parties are encouraged to report suspected modern slavery, human trafficking or exploitative working practices. Reports may be made to the HR Director & TQM Manager, or to any HR Business Partner or member of the Senior Management Team as an alternative route. Our confidential reporting route is available via our whistleblowing mechanism.

Reports are treated seriously and assessed promptly. Information is handled sensitively and shared only with those who need it for appropriate action, subject to legal requirements. We do not tolerate victimisation or retaliation against anyone who raises a concern in good faith. Where there is an

immediate risk to an individual's safety, appropriate emergency or safeguarding authorities are contacted.

No concerns were reported during this statement period.

## 8 · How we measure effectiveness

We monitor the implementation and effectiveness of our approach using indicators that include the following. Where we can report a figure for the year, we do; where we cannot, we have said so rather than omitting the measure.

| Measure                                                        | Position this year               |
|----------------------------------------------------------------|----------------------------------|
| Active suppliers assessed for modern slavery risk              | 16/16                            |
| Higher-risk suppliers subject to enhanced due diligence        | 6/16                             |
| Relevant suppliers that have accepted our supplier standards   | Issued to 16. Responses pending. |
| Planned supplier reviews and verification activities completed | 0                                |
| Relevant employees completing modern slavery training          | 4/7                              |
| Concerns raised and investigated during the year               | 0                                |
| Supplier corrective action plans completed and verified        | 0                                |
| Time taken to assess and respond to significant concerns       | N/A                              |

We interpret these measures in context. **A low number of reports does not necessarily demonstrate that modern slavery risks are absent**, and we consider the effectiveness of our reporting arrangements alongside other evidence.

## 9 · Progress, limitations and planned actions

We set out below an honest assessment of where we are. We consider that reporting limitations openly is more useful to our stakeholders, and more consistent with the purpose of the Act, than presenting a supply chain as fully assured when it is not.

### 9.1 Progress during the year

Policy reviewed and approved by the Board; Policy shared with all supplier partners; Risk categorisation of all suppliers using The Global Slavery Index.

## 9.2 Limitations we have encountered

Our activities during this statement period have been limited primarily because of the administration process. Whilst this had impacted our available resources, we have taken positive steps by securing relationships with legacy suppliers by way of increasing our confidence in the supply chain.

## 9.3 Actions planned for the coming year

We have identified the following priorities for the financial year ending 31/12/2027:

1. Complete supplier risk categorisation across the full active supply base and record the outcome against each supplier.
2. Incorporate modern slavery requirements into all new and renewed supplier contracts and set a target for coverage of the existing supplier base.
3. Introduce a worker-centred verification step for the highest-risk suppliers, rather than relying on documentation and self-declaration alone.
4. Extend modern slavery awareness training to all colleagues involved in sourcing, purchasing, contract management and recruitment.
5. Extend supply-chain mapping beyond tier one for the categories assessed as highest risk.
6. Establish a clear, monitored escalation route that includes notification to the appropriate UK authorities where a potential victim is identified.
7. Report the measures set out in section 8 with actual figures in next year's statement, including against the targets set here.

## 10 • Approval and signature

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This statement has been approved by the Board of Directors of Batt Cables Ltd. It is signed on behalf of the Board by a director, in accordance with section 54(6) of the Modern Slavery Act 2015.

It will be reviewed and updated annually and published on our website. We also intend to publish the statement on the UK government's modern slavery statement registry.



**Thomas Crewe, Chief Executive Officer**

For and on behalf of the Board of Directors, Batt Cables Ltd

Date: 22/10/2026

**Publication details:**

- Statement for the financial year ended 31/12/2026.
- Published 22/10/2026.
- Document reference: Batt Cables Ltd – Modern Slavery Statement 2026