

## Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It annotates the steps taken by Cullum Detuners Investments Limited and its subsidiaries (the “Group”), to prevent modern slavery and human trafficking in its businesses and supply chains.

### Group Overview

The Group comprises 5 trading subsidiaries (4 within the UK, and one within the Commonwealth of Virginia, USA), delivering engineering solutions to a variety of sectors. The Group employs around 180 FTEs, across 8 sites.

### Our Commitment

Cullum Group respects human rights, and will not tolerate any form of slavery within our businesses or wider supply chains. We are committed to playing our part in supporting UK and national governments in their fight against reducing modern slavery.

### Risk Assessment / Management

The Group operational leadership conduct a risk review process on a quarterly basis, to cover a wide range of fiduciary topics, and assess our wider exposure to Modern Slavery. As part of this process, Modern Slavery risk is considered, likely areas of concern noted, and the mitigations in place tested.

The below link is used to determine risk in relation to overseas supply chain

[Global Slavery Index | Walk Free](#)

### Key Mitigations

- (a) In addition to the above processes, key personnel within the business are subject to modern slavery awareness training. Completion of this training is monitored by HR department.
- (b) Dedicated supply chain audit – of suppliers where it’s believed a level of risk could exist.
- (c) Robust terms and conditions at subsidiary purchase order level.
- (d) Use of credible recruitment agencies

### Escalation Contact Details

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