



# TOPTUBES

**Top Tubes Limited**  
**2a Smith Road**  
**Wednesbury**  
**West Midlands**  
**WS10 0PD**  
**United Kingdom**  
**Tel: 0121 5061080**  
**www.toptubes.co.uk**

## Modern Slavery Statement

### Introduction

Top Tubes Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025

Top Tubes Ltd is a steel manufacturing company operating within the UK. Our operations include coil slitting, welded tube manufacture, cutting to length, tube-bending and manipulation, tube slotting, laser cutting . The organisation is committed to preventing slavery and human trafficking in its corporate activities and to ensuring the our supply chain is free from slavery and human trafficking.

### Modern Slavery & Human Trafficking

Modern Slavery and Human Trafficking Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. We are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery.

### Policy

We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

Our company policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business areas and to implementing and enforcing effective systems and controls. Top Tubes Ltd have the following policies which incorporate ethical standards for our staff.

- Modern Slavery Policy
- Anti-bribery / corruption policy
- Whistle-blowing policy

Our policies and procedures are reviewed on a regular basis to ensure compliance and ethical standards of working. The company would ensure thorough investigations would be undertaken should there be any suspicion of slavery or human trafficking within its organisation or supply chain.

Modern Slavery posters and communication are visible on site.

Top Tubes Ltd have planned assessment methods for utilising and re evaluating suppliers on a periodic basis. This is in accordance with our supplier evaluation process QP8 utilised by purchasing Managers.

### Declaration

This statement is published in accordance with section 54 of the Act, was approved on 1<sup>st</sup> April 2024 by the organisations Managing Director, who will undertake to review and update it annually.

Directors Name: Ms April Pearson-Myatt

Directors Signature:

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*April Pearson-Myatt*  
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Date: 8/6/2024