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1.0 Purpose

Smiley Monroe Ltd have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are also committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our business and supply chains. We expect the same high standards from all of our suppliers, contractors and other business partners.

2.0 Our Business

Smiley Monroe's Head Office is in Lisburn, Northern Ireland. Smiley Monroe has grown to become the leading global producer of hot spliced Endless Conveyor Belts and Custom Cut Parts for the materials processing equipment manufacturing sector. The company products are exported to 60 countries serving 7 equipment segments; crushing, screening, recycling, washing, environmental and road construction.

At Smiley Monroe, we believe our people and our business relationships are our strength which is why we are committed to behaving in line within our company values of; Safe Place to Work, Close to Our Customers, One Big Family, Problem Solvers and Determined to Succeed.

3.0 Definitions

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The company considers modern slavery to encompass:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

4.0 Supply Chains

The main supply chains of Smiley Monroe include those related to the supply of rubber belting, sheet rubber and other products from various suppliers throughout Europe and primarily Asia. We understand some of our suppliers are intermediary traders and therefore have further contractual relationships with lower tier suppliers.


5.0 Potential Exposure

Smiley Monroe consider its main exposure to the risk of modern slavery to exist within our supply chain, this is due to the protection against breaches of human rights being limited in some countries.

Overall, the company considers its exposure to modern slavery to be relatively limited. Nevertheless, the company have taken steps to ensure such practices do not take place in its business nor the business of any organisation that supplies goods and or services to us.

6.0 Due Diligence

Smiley Monroe carry out due diligence processes to ensure modern slavery does not take place in our business or supply chains.

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In accordance with section 54(4) of the Modern Slavery Act 2015, Smiley Monroe have taken the following steps to ensure modern slavery is not taking place:

- As part of the application process for new suppliers they are asked to confirm that they have read and are willing to abide by the principles set out in the Code of Conduct.
- Introduced a termination clause in our new supplier contracts in the event that a supplier is, or is suspected, to be involved in modern slavery.
- Conduct regular audits of our suppliers.
- Ensure all UK based employees are paid in line with UK living wage and national minimum wage standards and all non UK based employees are paid to any relevant wage standards within the country they are employed.
- Communicate the company Modern Slavery Policy to all employees and suppliers.

The company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

7.0 Commitment

Smiley Monroe acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company understands that this requires an ongoing review of both internal practices in relation to employees and our supply chains.

Smiley Monroe's Modern Slavery Policy, along with our Anti-Bribery and Whistleblowing Policies reflect our commitment to acting ethically and with integrity in all our business relationships.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.



Vaughan Monroe
Managing Director