

## MODERN SLAVERY STATEMENT

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### **Business Organisation, Structure and Supply Chain**

The Stannah Group operates internationally across supply chain, manufacturing and sales distribution. We directly employ a large number of people internationally and maintain relationships with many different organisations.

We are committed to acting ethically and with integrity in all our business dealings. We sum up this approach with the words 'We take care'. This is the essence of our brand – our central organising principle and we use it to guide everything that we do.

### **Policy**

We are committed to opposing modern slavery in all its forms and we expect the same attitude from all other organisations with which we do business. The Group realises that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

We will ensure that everyone in our business and our business partners know our behavioural standards. We will avoid doing business with those who do not accept our values and who may contravene our policy.

This policy supplements other existing policies and documents to provide guidance and transparency for all employees. These include (but are not limited to):

- Ethical behaviour policy
- Sustainability and environmental policies
- UK Bribery Act policy
- CIPS Code of Conduct for Purchasing Professionals Public
- Disclosure (whistle blowing) policy

The Group Directors and Senior Management have the responsibility for implementing this policy and its objectives and will allocate resources (people, training, time) as required. We will regularly review, report on and update this policy.

## Risk Assessment and Due Diligence

We recognise modern slavery can happen anywhere, which is why we will provide all budget holders and financial decision makers with awareness training.

However, we recognise our extended supply chains present the greatest levels of risk.

Our ethical approach to business infers that we prefer to source as locally as possible. However, we recognise our supply chains are inevitably international by nature and can therefore be challenging to manage.

We invest in relationship management throughout the Group so that we can foster long-term relationships with suppliers and contractors to understand their business, regularly visiting and reviewing key suppliers and mitigating risks where appropriate.

## Training

We regularly train relevant employees in ethical business policies, corporate social responsibility and the UK Bribery Act and include whistleblowing policies and procedures. During 2017, we incorporated modern slavery awareness training into our regular ethical business training programme for all employees.

We train all purchasing professionals to the Chartered Institute of Purchasing and Supply qualification and during 2017, we added a detailed training module to cover aspects of modern slavery not covered by the above for relevant employees and business leaders.

## Key actions to date

Over the last 18 months, Stannah has achieved and is working towards:

### Provided Awareness Training

We have:

- provided training to employees. Since the launch in February 2017, key budget holders and relevant employees have successfully completed a modern slavery training workshop. We plan to roll out an on-line training awareness to all employees by December 2018, using SCORM compliant Moodle courses, to provide them with useful information on the different types of slavery, how to recognise the signs and key contact details.

- as well as training employees, the organisation has raised awareness of modern slavery issues by circulating information to employees.
- we also plan to carry out awareness presentations to key suppliers (who manufacture or source the majority of our product).

## **Improved Compliance**

- We have updated relevant existing legal contracts and general purchasing terms and conditions with suppliers and contractors, to include clauses pertaining to modern slavery and risk factors.

## **Improved Policies**

- We have amended relevant business processes and documentation to account for the requirements of Modern Slavery and communicated changes to our supply chain.

## **Enforcement/Due Diligence**

- We continue to work with our suppliers to resolve any issues identified and report the outcomes to business leaders.
- We will assess existing suppliers, which have a greater degree of focus on slavery and human trafficking, where general risks are identified.
- We will evaluate modern slavery and human trafficking risks of each new supplier through our approval process.
- We will act against suppliers that fail to improve their performance in line with our requirements, including termination of the relationship.



Jon Stannah  
Group Managing Director