

M O D E R N SLAVERY DOCUMENT

Business Organisation, Structure and Supply Chain

The Stannah Group is a leader in the supply and manufacture of lifting products for both domestic and commercial applications. The Group has manufacturing sites in the UK and Czech Republic, 11 international subsidiary businesses and works with numerous distributors in other international markets. Across our UK and international businesses, we employ over 2000 people. We source finished product, raw materials and components from UK and international markets.

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

This relates to all companies in the Stannah Group. It reflects our position at the end of our 2020 financial year and references objectives for 2021:

Provided Awareness Training

We have:

- Ensured that we continue to fulfil our commitment to provide Modern Slavery training to all key budget holders and to other relevant employees.
- We have provided further information in the form of blog posts to our Intranet. This is important in maintaining awareness of modern slavery for all our employees. We plan further posts during 2021.
- We have carried 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 have planned for an e-learning offering for relevant Stannah employees that will update our training records. Learning outcomes include an improved understanding of the different types of slavery and the risks, and what our organisation can do to address those risks. We intend to implement this plan during 2021.
- We will assess existing suppliers where general modern slavery and human trafficking risks are identified.
- We continue to work with our suppliers to resolve any issues identified and report the outcomes to business leaders.
- 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