

MODERN SLAVERY DOCUMENT

Introduction

Modern slavery is an appalling crime that deprives a person of their freedom and dignity for another person's gain. Unfortunately, it still affects millions of people around the world. Stannah has a zero-tolerance approach to modern slavery and is committed to opposing it in all its forms and we expect the same attitude from all other organisations with which we do business.

Stannah 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 fully support the government's objectives to eradicate modern slavery and human trafficking. 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.

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, Czech Republic and the US, 11 international subsidiary businesses and works with numerous distributors in other international markets. Across our UK and international businesses, we employ over 2300 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. 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
- Equality, Diversity and Inclusion Policy
- Sustainability policies
- UK Bribery Act policy
- CIPS Code of Conduct for Purchasing Professionals
- 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. Our extended supply chains present the greatest levels of risk but our ethical approach to business infers that we prefer to source as locally as possible. However, supply chains are inevitably international by nature and can therefore be challenging to manage.

We invest and hold in very high regard 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, their premises and factories, mitigating risks where appropriate.

To date we have not been made aware of any human trafficking or slavery allegations against our supply chain but rest assured if there were we would take immediate action to understand and verify the issue which could lead us to terminate our contract with the supplier.

Training

We regularly train relevant employees in ethical business policies, corporate social responsibility and the UK Bribery Act and include whistleblowing policies and procedures. We train all purchasing professionals to the Chartered Institute of Purchasing and Supply qualification.

Key actions to date

This relates to all companies in the Stannah Group, it reflects our position at the end of our 2022 financial year and references objectives for 2023.

Training

- During the past 12 months we have trained all of our UK employees in equality, diversity and inclusion. This has been via e-learning and team briefings.
- We have refreshed the knowledge of managers and other appropriate employees (Purchasing, Finance and purchase order approvers) in relation to Corporate Criminal Offences which supplements the Modern Slavery Act.
- We have provided further information in the form of blog posts on our intranet. The information provided a detailed explanation of modern slavery along with the number of people it is estimated to affect, why Stannah has a modern slavery policy, where to find it and what to do if anyone is concerned about it in the business or for a person. It is important to maintain awareness of modern slavery for all our employees and we plan further posts during 2023.
- We issue our modern slavery declaration annually to suppliers. The declaration also forms part of our new supplier process.

Enforcement/due diligence

- In 2023 we will be refreshing our existing briefing materials to ensure that they remain current and appropriate for our internal audience.
- We will continue to review and strengthen our approval process for suppliers, contractors and sub-contractors to provide greater assurance of compliance.
- We will assess existing suppliers where general modern slavery risks are identified and report the outcome to the business. To date we have not had any instances of this type to cause undue concern. This provides some assurance over the effectiveness of our controls.
- We will continue to use our modern slavery declaration in our new supplier, contractor and sub-contractor approval process to ensure all suppliers are aware of our stance and what is expected of them.
- We will act against any suppliers that fail to improve their performance in line with our requirements, including termination of the relationship.



Jon Stannah
Group Managing Director