

# Anti-slavery and Human Trafficking Policy

Since our incorporation in 1989 the Scolmore International Group has become a significant force in the electrical accessory market.

We're proud to be a British, family-run business, with an excellent track record of listening to what our customers need and providing the right solution every time.

The Company is very much built on people. Each individual makes a unique contribution to the business and its customers.

*"Our long-term business success and continuous growth is only possible by operating responsibly in alignment with universal standards."*

## TABLE OF CONTENTS

1	INTRODUCTION .....	1
1.1	WHY? .....	1
1.2	THE FIGURES .....	1
1.3	THE LAW .....	1
1.4	THE BUSINESS ROLE .....	2
1.5	TRANSPARENCY IN THE SUPPLY CHAINS.....	2
2	WHO DOES THIS POLICY APPLY TO?.....	2
2.1	THE SCOLMORE GROUP STRUCTURE AND SUPPLY CHAIN .....	2
2.2	COUNTRIES OF OPERATION AND SUPPLY .....	2
3	SCOLMORE'S COMMITMENT .....	2
3.1	RESPONSIBILITIES .....	3
3.2	BUSINESS PARTNERS.....	3
3.3	SPEAK UP .....	3
3.4	OTHER RELATED POLICIES.....	3
3.5	KEY PERFORMANCE INDICATORS .....	4
4	REVISION AND APPROVAL .....	4

## 1 INTRODUCTION

At Scolmore Group integrity is essential to our business.

We are committed to conducting business in a responsible and sustainable way and require the same of our workforce, suppliers, contractors and other business partners.

Scolmore's *Anti-slavery and Human Trafficking* policy has been introduced in accordance with the Modern Slavery Act 2015.

This policy is intended to give our employees, suppliers, contractors and other business partners guidance on Scolmore's approach to modern slavery and human trafficking and the measures that Scolmore has taken in order to assess all potential modern slavery

risks related to its business and put in place actions aimed at ensuring no slavery or human trafficking occur in its own business and supply chains.

### 1.1 WHY?

Modern slavery is happening in the UK and around the globe today. It is a serious and often hidden crime resulting in an abhorrent abuse of human rights, in which people are exploited for criminal gain.

### 1.2 THE FIGURES

In 2016 there were an estimated 40 million people in slavery globally.

### 1.3 THE LAW

The UK Modern Slavery Act is one of the most far reaching pieces of legislation in the world addressing issues of modern slavery.

Modern slavery is defined as “a term used to encapsulate both offences in the Modern slavery Act: - slavery, servitude and forced compulsory labour; - and human trafficking”

The impact can be devastating for the victims.

#### 1.4 THE BUSINESS ROLE

Each business has a pivotal role to play in the fight against modern slavery.

From a business point of view, any association with modern slavery could damage reputation in a serious and potentially permanent way. It creates the image of an organization that cannot be trusted and puts profits before the welfare of its workers and other stakeholders. Companies may face backlash from consumers if they are found to be in any way complicit in modern slavery.

#### 1.5 TRANSPARENCY IN THE SUPPLY CHAINS

The supply chains of large organizations are often complex with many tiers. Even so businesses can take a number of steps in order to mitigate the risk of their products or services being made by slaves or forced labour.

### 2 WHO DOES THIS POLICY APPLY TO?

This policy covers the activities of every Company within the Scolmore Group and applies to the whole workforce, including permanent and temporary employees, contractors, agency workers, stock suppliers and other business partners.

#### 2.1 THE SCOLMORE GROUP STRUCTURE AND SUPPLY CHAIN

The Scolmore Group is a group of companies consisting of Scolmore (International) Ltd, which is the highest parent, based in Tamworth, Staffordshire (United Kingdom) and the following wholly owned operative subsidiaries:

- Ovia Ltd, based in Tamworth, Staffordshire (UK),
- Elite Security Products Ltd (ESP), based in Redditch (UK),
- Unicrimp Ltd, based in Tamworth, Staffordshire (UK),
- Sangamo Ltd, Port Glasgow (UK),
- Scolmore International Electrical trading LLC based in Dubai,
- Scolmore International Middle East FZE based in Dubai,

- CLICK Scolmore Electrical and Lighting (Hangzhou) Co Ltd based in China,
- Lumen 8 Lighting Ltd based in Hong Kong.

From our head quarter based in the Midlands, we are well positioned to design, develop, manufacture and distribute our product range throughout the UK as well as internationally.

Through our own brand of electrical and lighting products, we are committed to providing a comprehensive range of reliable, high quality and competitively priced products to our customers.

Our Product Development Team are constantly tracking market trends, building regulations and approval standards so that we continue to increase our product range to meet the ever-changing needs of our customers.

#### 2.2 COUNTRIES OF OPERATION AND SUPPLY

The Group currently operates in the following countries:

- United Kingdom
- Ireland
- Germany
- Dubai
- India
- China
- Taiwan
- Vietnam
- Australia

### 3 SCOLMORE'S COMMITMENT

Scolmore's policy is Zero tolerance to slavery and human trafficking.

The Group is absolutely committed to preventing slavery and human trafficking in its corporate activities and operations, and to ensuring that its supply chains are free from slavery and human trafficking in line with the requirements of the Modern Slavery Act 2015, Employment practices and the international Human Rights Act.

In compliance with the above fundamental principles, we will

- Raise awareness of the issue of modern slavery and human trafficking and the potential risks of the modern slavery occurring in our supply chains.

- Provide induction and training to all staff directly involved with the supply chain as well as the HR and Legal & Compliance departments, addressing the objectives of this policy.
- Issue a Scolmore Supplier Code of Conduct aimed at ensuring our values are adhered to and respected.
- Review on a regular basis all aspects and risks associated to the supply chain.
- Perform due diligence and communicate the objectives of this policy and the risk of modern slavery in supply chains to all suppliers and other business partners as deemed appropriate.
- Regularly assess our supply chain directly and/or through independent auditors.
- Engage only with reputable verified employment agencies to source labour.
- Engage only with business partners committed to the same principles.
- Implement mitigation activities to address supply chain risks that may arise.
- Review annually the effectiveness of the present policy.

### 3.1 RESPONSIBILITIES

It is the responsibility of all employees to comply with the policy and to ensure that slavery or human trafficking is not taking place anywhere in our business.

Should employees breach this policy they may be subject to appropriate disciplinary action, up to and including dismissal.

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Operating Officer under the guidance of the Group Legal and Compliance Manager is responsible for implementing this policy, monitoring its use and effectiveness, dealing with any queries and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate and regular training on it and the issue of modern slavery and human trafficking in supply chains.

### 3.2 BUSINESS PARTNERS

We expect all our business partners and particularly those in our supply chain to comply with our values.

Should a supplier, contractor or other business partner, act in breach of the present policy they will be investigated and provided with guidance to remedy the situation. If no improvement is implemented or they indicate an unwillingness to cease the unacceptable practices, then our trading relationship will cease with immediate effect and we will report them to the appropriate authorities.

### 3.3 SPEAK UP

The Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation.

This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Group's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Employees, customers or others who have concerns should raise their concerns.

In most instances the preferred options to report concerns is your line manager (if you are an employee) or your usual contact (if you are external to the Scolmore Group). However we understand that in certain circumstances this might not be the most comfortable way to share your concerns.

If this is the case, you can either speak or email to HR [hr@scolmore.com](mailto:hr@scolmore.com) or the Legal and Compliance department [compliance@scolmore.com](mailto:compliance@scolmore.com).

Scolmore Group and its subsidiaries will always protect you from any kind of retaliation if you report actual or potential violations in good faith. All reports made in good faith under this procedure remain confidential regardless of how they are notified.

### 3.4 OTHER RELATED POLICIES

The "*Dignity at work*" policy is aimed at providing a working environment that ensures that all employees are treated fairly, equally and decently. We believe that everyone has the right to be treated with dignity and respect.

Harassment or bullying can cause fear, stress, anxiety and it can, therefore, affect job satisfaction and an individual's morale. We regard any form of harassment and bullying as totally unacceptable behaviour and will not permit it or condone it in any form.

The “*Equal opportunity and diversity*” policy is designed to achieve a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, sex, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation. This policy aims to remove unfair and discriminatory practices within the Company and to encourage full contribution from its diverse community. We are committed to actively opposing all forms of discrimination

### 3.5 KEY PERFORMANCE INDICATORS

The Scolmore Group have identified the following key performance indicators (KPIs):

- All onboarding relevant staff to have completed training on modern slavery within 6 months from starting date
- All relevant staff to complete refresher courses at biennial intervals (every 2 years)
- All business partners to be subject to due diligence program based on a risk scoring matrix.

## 4 REVISION AND APPROVAL

This policy does not form part of any Scolmore employee's contract of employment.

Scolmore Group reserves the right to amend any policies or procedures outlined within this policy as deemed appropriate (including, but not limited to, changes required to comply with local legal or regulatory requirements) and any decision to do so will be made entirely at Scolmore's discretion.

This policy will be reviewed annually and may be amended at any time.

*Gary Mordue*  
Chief Executive Officer

Date: 20.05.2022