

## Modern Slavery Policy Statement

### Introduction

At Leadec, we have a zero-tolerance approach towards Modern Slavery. This statement sets out the actions we have taken, and will continue to take, to prevent slavery and human trafficking within our business, whilst ensuring that our supply chains are also free from slavery and human trafficking. This statement relates to actions and activities during the financial year 1 January 2021 to 31 December 2021.

Leadec are the leading service specialist for the factory of today and tomorrow and a global specialist supplier of support services in the manufacturing sector, providing facilities management, engineering, assembly and logistics solutions worldwide. With more than 50 years' experience in the manufacturing industry, during the past 10 years, Leadec have diversified our footprint to offer our expertise to the wider manufacturing sector, growing Leadec's operations to over 300 sites in 14 countries and employing over 18,000 staff. As at 31 December 2021, Leadec UK had 1,611 employees.

### Tackling Modern Slavery within Leadec

We have a number of policies and procedures in place that apply to all employees working for Leadec in order to prevent slavery and human trafficking within our operations. These include:

- A **Leadec Code of Conduct** issued on behalf of Leadec Global which states the actions and behaviour expected of our employees when representing the organisation. This also includes a section on working conditions which states: *Leadec gives its employees fair pay and provides fair working conditions in compliance with all statutory requirements. We therefore also reject all forms of forced labour and child labour, and we will not obstruct lawful employee representation.*
- All employees must evidence their Right to Work in the UK before any offer of employment is made or within 60 days of any Transfer of Undertakings (Protection of Employment) Regulations 2006 (also known as TUPE).
- In 2021 we introduced a new Right to Work app across our entire business. The app includes additional security measures, such as facial recognition and capturing MRZ and Biometric chip data. This ensures a more robust recruitment and TUPE transfer process, in line with our obligations in respect of the Immigration, Asylum and Nationality Act 2006.
- We have recognition agreements in place with Trade Unions for the purposes of collective bargaining across our business. We respect the rights of our employees to belong or not to belong, to a Trade Union.
- Employees are not permitted to have their salary paid to a third-party bank account. This means that any new starters are required to provide the details of their own named bank account (either individual or joint account) in order to be paid. This not only reduces the opportunity for fraud in our business, but also ensures employees are paid directly for the hours they work.
- All new managers that join Leadec receive an awareness guide, detailing the principles of the Modern Slavery Act 2015; how they can identify slavery including

warning signs and indicators; how to escalate any concerns and the external support available, including the Modern Slavery Helpline.

- In 2021, the HR team delivered workshops on to all Leadec Supervisors and Managers, explaining Modern Slavery, the frequent indicators/signs within the workplace and how to escalate concerns, further reinforcing the focus on ensuring individuals (agency staff and employees) are not exploited whilst working for Leadec.
- We also updated our right to work policies, following the UK leaving the European Union and the introduction of the EU Settlement Scheme.

In addition to the above, we also have a **Whistleblowing Policy** in place which provides a framework for all employees, ex-employees, consultants, agency workers, work experience and contractors to raise concerns where they identify any potential signs of slavery, human trafficking or other human rights abuses. This can be reported directly to Leadec's Compliance Officer or the HR Department. In 2022, we will engage an independent and external whistleblowing service provider, which will establish a safe and confidential reporting system allowing individuals to speak up and report concerns to the Leadec Board of Management.

### **Tackling Modern Slavery within Leadec's Supply Chain**

Leadec sources goods and services from an extensive network of suppliers that are predominantly purchased through organisations situated in the United Kingdom. The diversity of these suppliers presents challenges in efficiently and effectively assessing and addressing supply chain related issues such as human rights.

In addressing all risks including slavery and human rights within our supply chain, Leadec introduced in 2018, a strategic approach to supplier management, as part of this process our supply chain will be categorised according to their strategic importance to the company.

Those suppliers identified as Tier 1 suppliers will be our primary focus, these are organisations with have a significant impact upon the quality of goods and or services we use in undertaking our business.

As part of the Leadec Supplier Relationship Program suppliers will be managed actively in accordance with their respective tier status. There are agreements in place with the suppliers which range from framework agreements through and standard terms of purchase. It is a requirement during the onboarding process for suppliers to accept the Leadec Conditions of Purchase. Leadec communicates the standards expected of its suppliers through a variety of means including but not limited to supplier assessments, supplier selection, direct interaction, emails and through the Corporate website.

Leadec onboard suppliers using an established cloud based, for a supplier to become a partner to Leadec they undergo assessments and selection based on the criticality of the goods and or services being provided. These processes require the evidence of quality systems and other certification including Modern Slavery statements.

Supplier applications are reviewed and scored by the Leadec Procurement team, only after satisfactory scoring is reached are suppliers added to the supply chain.

If we become aware of any slavery or human trafficking concerns, we reserve the right to suspend and ultimately deselect suppliers if the concerns are not addressed in an acceptable timeframe dictated by Leadec.

The Leadec Group Code of Conduct includes a section titled, Cooperation with Business Partners, this section specifically focuses on Leadec's expected standards for its contractual relationships. A copy of this Code of Conduct is issued with all new supplier applications and all suppliers being onboarded are required to confirm receipt, acknowledgement and confirmation of understanding of all matters held within this Code of Conduct.

### **Acquisition of Partners in Hygiene**

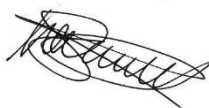
Leadec acquired Partners in Hygiene (PiH), a specialist hygiene company delivering hygiene and cleaning services predominantly in the food and beverage industry. They have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any of the supply chains.

PiH expect the same high standards from all their contractors, suppliers and other business partners. As part of the contracting processes, PIH include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that their suppliers will hold their own suppliers to the same high standards.

During 2022, PiH will integrate into Leadec and all policies and procedures will be adopted to ensure alignment with the business and a continued zero-tolerance approach towards modern slavery within the workplace and throughout our supply chain. As part of this integration, Leadec have been granted a GLAA licence from the Gangmasters and Labour Abuse Authority.

This statement was approved on 16<sup>th</sup> May 2022 by the UK Leadec Board of Management.

**Lee Smith, Managing Director:**



**Claire Gathercole, Finance Director:**

