

# **Modern Slavery and Human Trafficking Statement**

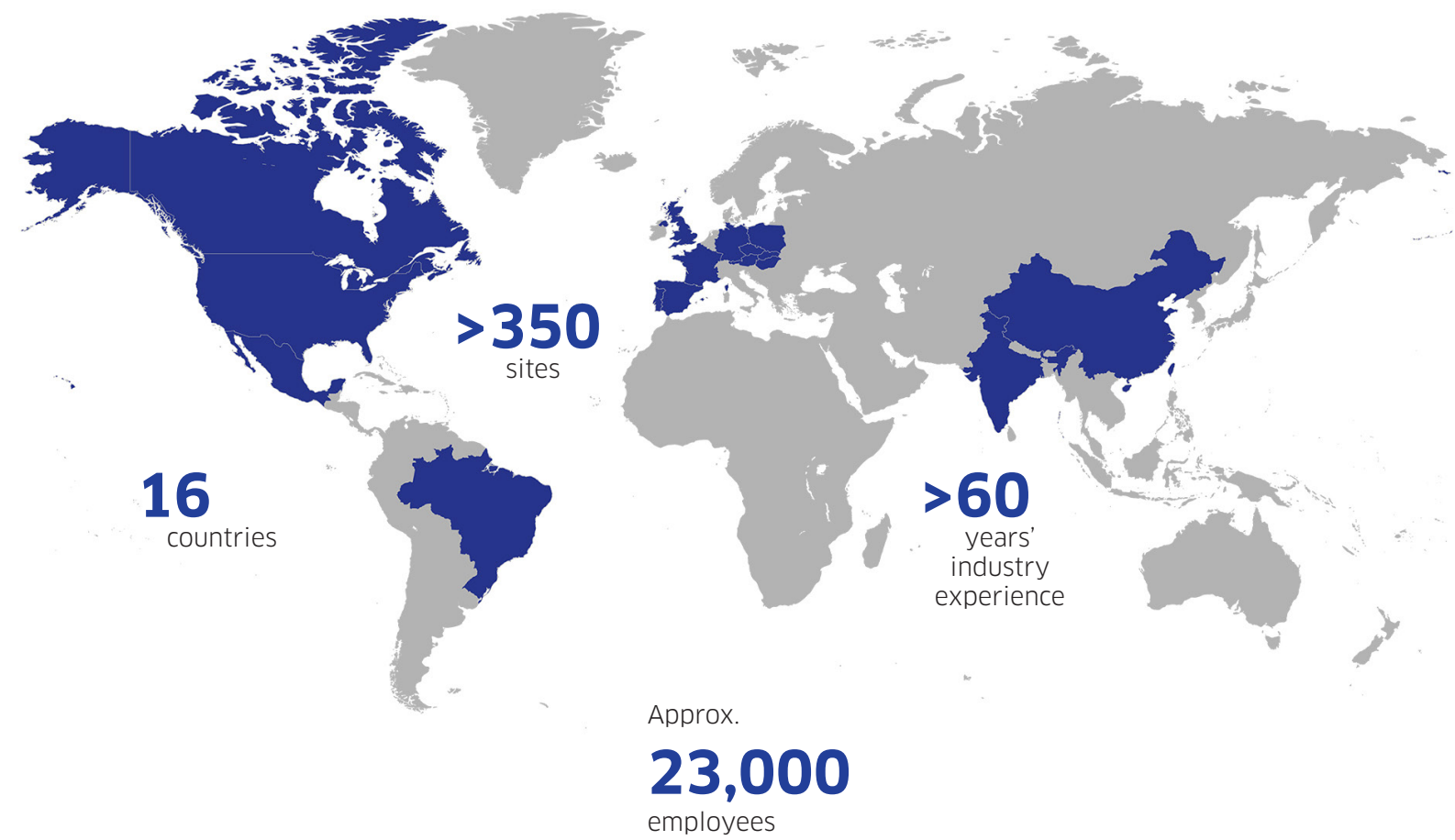


At Leadec, we have a zero-tolerance approach towards modern slavery and human trafficking and are committed to acting ethically and with integrity in all business dealings and relationships. We continue to enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

This statement sets out the actions we have taken, and will continue to take, to prevent slavery and human trafficking. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

Organisational Structure

Leadec is the world’s leading service specialist for the entire life cycle of a factory and the associated infrastructure, providing facilities management, engineering, assembly and logistics solutions worldwide. For over 60 years, we have been providing customers in the automotive and manufacturing industries with support along the entire factory life cycle: from planning, installation, and automation to operation of the factories and buildings, growing Leadec’s operations to over 350 sites in 16 countries and employing over 23,000 staff. As at 31 December 2023, Leadec had 1,604 employees in the UK.



Policies and Procedures in respect of Modern Slavery and Human Trafficking within Leadec

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

Leadec Group Code of Conduct

This outlines the standards, actions and behaviours expected of our all employees when working for Leadec. This is a Global Code of Conduct and all employees are required to sign up to the Code of Conduct as part of their onboarding to Leadec. It is regularly reviewed by Leadec Group with the most recent review in January 2023.

The Code of Conduct specifically states:

- Leadec respects human rights worldwide.
- 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.

Recruitment and Onboarding Procedures

We undertake right to work checks for all individuals joining Leadec directly. 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 under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (also known as TUPE).

We use a Right to Work app across our business to undertake right to work checks. The app has robust security measures in place, including facial recognition and the reading of biometric data, which ensures a more robust recruitment and TUPE transfer process, in line with our obligations in respect of the Immigration, Asylum and Nationality Act 2006.

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.





We use only specified and approved employment agencies to support our operations with temporary labour. Our Procurement Department verifies the practices of any new agency we use, before accepting workers from that agency.

All new salaried employees receive an awareness guide as part of their onboarding into Leadec, detailing the principles of the Modern Slavery Act 2015, the potential warning signs and indicators, how to escalate any concerns and the external support available, including the Modern Slavery Helpline.

**Whistleblowing Policy**

This Policy provides a framework for all individuals working for and on behalf of Leadec (including but not limited to employees, ex-employees, consultants, agency workers, work experience, and contractors) to raise concerns regarding the Company. This also extends to potential signs of slavery, human trafficking, or other human rights abuses. The Policy is regularly updated and communicated to all individuals working within Leadec, with a further update due in 2024. All individuals working for or on behalf of Leadec are issued with a copy of this Policy when joining the business and must sign to confirm that they have understood this.

Concerns in respect of modern slavery can be raised to:

- An individual’s line manager;
- Leadec’s Compliance officer;
- The Leadec Integrity Line; or
- Safecall.

Safecall is an independent and external whistleblowing service provider which enables individuals to report any concerns via confidential reporting facility. Any concerns reported through Safecall are raised to the Board of Management and fully investigated.

**Working Time Regulations**

We ensure that our employees, including young workers, comply with the Working Time Regulations. Employees are able to opt out of the 48-hour working week limit working hours. We monitor daily and weekly rest breaks, and all employees that are and night workers.

**Training on Modern Slavery**

Modern slavery training has been delivered to all supervisors and managers. This training explains modern slavery, the frequent indicators and/or signs within the workplace and

how to escalate concerns, further reinforcing the focus on ensuring individuals are not exploited whilst working for Leadec. If our management team identify any potential signs of modern slavery or have any concerns, they are aware that they must contact the Human Resources Department or the Compliance Officer.

This training will be further extended across our Leadec business as part of our commitment to our Global sustainability plan: the goals of which are aligned with the United Nation Sustainable Development Goals (UN SDGs). By 2025, we will deliver training to more than 90% of Leadec employees worldwide on human rights and modern slavery, further demonstrating our commitment to respecting human rights.

**Trade Union Membership**

We recognise and respect each employee’s right to freedom of association, including the right to belong or not to belong, to a Trade Union. We have recognition agreements in place with Trade Unions for the purposes of collective bargaining across our business.

**Risk of slavery and human trafficking within Leadec**

We have reviewed the modern day slavery and human trafficking risks within Leadec. In doing so, we have considered the industries we operate in, the locations of our operations and the current policies and procedures we have in place. Based on this, we consider that the risk of modern slavery or human trafficking occurring within the Leadec workforce to be low.

To date, no reports have been raised with regards to modern slavery within Leadec operations. In the event a concern was raised, this would be treated extremely seriously. An immediate and thorough investigation would be undertaken by a senior manager, with appropriate support from the Human Resources Department and Compliance Officer.





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 each supplier’s strategic importance to the Company.

Those suppliers identified as Tier 1 suppliers will be our primary focus. These are organisations which 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 Programme, suppliers will be managed in accordance with their respective tier status. There are agreements in place with the suppliers which range from framework agreements through to 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 onboards suppliers using an established cloud-based system. For a supplier to become a partner to Leadec, they must undergo assessments and selection based on the criticality of the goods and/or services being provided. These processes require 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 entitled “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 understanding of all matters held within the Code of Conduct.

About This Report

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been prepared by the Human Resources and Procurement Departments and approved for publication by the Leadec UK Board of Management on 13th May 2024. It provides a summary of the steps we have taken to address the risk of slavery and human trafficking taking place within Leadec UK’s operations and supply chain, and is published annually.



Lee Smith  
Managing Director



Claire Gathercole  
Finance Director



Lucy Roger  
HR Director

**Leadec UK is committed to ensuring the human rights, dignity, and wellbeing of everyone who works for and with our Company. We will continue to play our part in the fight against modern slavery in all its forms by building greater understanding amongst our own teams and only working with suppliers that meet our strict ethical standards.**

**– Lee Smith, Managing Director**

