

# Positec (UK & Ireland) Ltd

## Modern Slavery Transparency Statement

The statement below was approved by the Board of Positec Group and its relevant subsidiaries in relation to the financial period ending 31st December 2020.

### Positec Power Tools Europe Ltd

#### Modern Slavery Transparency Statement 2020

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery Transparency Statement for **Positec Power Tools Europe Ltd** and its relevant group subsidiaries for the financial year ending 31st December 2020. **Positec Power Tools Europe Ltd** are referred to as Positec UK throughout this statement.

### Introduction

Positec UK is opposed to all forms of unethical business behaviour. We recognise the harmful impact that Modern Slavery has on individuals and society and we are committed to help prevent these illegal practices. Modern Slavery is one of the material focus areas and our customers, suppliers, investors, colleagues and communities expect us to manage this risk and protect the rights and welfare of workers within our own business and our supply chains.

### Our businesses and our supply chains

The principal activity of the company is the distribution and sale of battery powered technology for the home improvements and outdoor power equipment and power tool sector. The company is the main UK and Ireland trading arm for the Positec Group with headquarters in Suzhou, China.

Positec UK serves a broad range of end markets from generalist to specialist propositions in the construction, landscaping and home improvement markets. Positec UK employs less than 30 people and does not own or operate any manufacturing or storage facilities. In 2019, we generated a turnover of £19 million. Positec UK's businesses have established supply chains, sourcing products predominantly from Positec Group in China and providing it to retailers in the UK.

### Policies and control on Modern Slavery

Positec UK is committed to comply with all applicable laws and regulations. We manage a governance framework for all relevant focus areas within our sustainable business framework, including Modern Slavery. A Modern Slavery and Human Trafficking policy is approved by Positec UK Leadership Team, detailing the commitments Positec UK align to in order to prevent these risks from occurring either in our own business or our supply chains. This policy and all other policies and tools referred to in this statement apply to Positec UK and where applicable to Positec Group to the extent practicable and provided it does not conflict with local legislation.

Positec UK's policy commitments on Modern Slavery and Human Trafficking are as follows:

- We will assess Modern Slavery and Human Trafficking risks in our business and supply chain.
- We will comply with all relevant employment and human rights laws for the countries in which we operate.
- We will conduct due diligence on labour agencies to reduce the risk of slavery.
- We will define clear supplier expectations and assess supplier compliance according to identified risk.
- We will make guidance available to suppliers and customers to support their due diligence programmes.
- We will provide training to employees including the 'red flags' of Modern Slavery and Human Trafficking.
- We will provide a whistle-blowing line for employees to anonymously report any concerns.
- We will monitor performance against Key Performance Indicators to continually improve.

Compliance with the policy is monitored and managed and the responsibility for compliance sits with all employees to some degree (and this is managed through training). Accountability for delivering against Positec UK's commitments remains with senior management but Human Resources will be the lead for Anti-slavery and Human Trafficking. A company Leadership Team will monitor performance and support continued improvement. The Modern Slavery and Human Trafficking policy is supported by other policies including a Responsible Sourcing policy, Recruitment policy and other relevant policies in the Employee Handbook.

Regarding our own employees, we uphold high standards, operate in line with our recruitment policies and comply fully with the relevant employment laws. We have clear standards of conduct which are included in our Employee Handbook. The Employee Handbook includes a specific section on Personal Harassment, Equality, Inclusion and Diversity including the red flags for colleagues to be aware of. Our employees have access to a whistleblowing line and are encouraged to report any concerns. No reports were registered via the whistleblowing line in 2020 relating to modern slavery. The employee due diligence process, described in the following section, includes checks both across our direct employee population and any temporary employees recruited via agencies.

## **Risk assessment**

Positec Group requires that BSCI and SEDEX audits are performed at all of our manufacturing sites and suppliers are requested to undertake ethical audits in line with the ETI Base Code.

Positec UK revisit our risk assessment process to ensure that our mitigation efforts are applied most effectively.

## **Due diligence**

Any incidents of modern slavery will be escalated to group level, gathering information and investigating non-compliances, as well as a process for deciding further action or escalation.

Direct recruitment into Positec adheres to regulatory requirements relating to Right to Work checks. Additional due diligence is conducted to identify red flags of Modern Slavery across our directly-employed workforce.

Our suppliers of products are contractually committed to our ethical requirements through reference to our Supplier Commitments in the standard trading agreement.

## Training

We launched a new Code of Conduct in 2021, which details the red flags for colleagues to keep an eye out for. The Home Office Modern Slavery Awareness Booklet is issued to all UK employees and this will be complemented by a Modern Slavery training module suitable for all UK colleagues which is due for completion by November 2021.

As part of our employee induction and training programme, all our employees are required to read and confirm their understanding of our Compliance Code of Conduct. Our Code of Conduct and policies and procedures are available to all employees on our intranet. Updates to the Compliance Code of Conduct and associated policies and procedures are circulated to employees through email, who are again required to read and confirm their understanding. We ensure everyone responds and we keep records of employee confirmations.

## Key Performance Indicators

Our leading KPI for Anti-slavery performance is training completion. We also track whether there have been any reported incidents of Modern Slavery during the year. Although Responsible Sourcing policy, Recruitment policy and other relevant policies have been followed we have not yet set specific performance KPIs. We will set appropriate KPIs during 2021.



Spencer Funnell  
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Positec Power Tools Europe Ltd  
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