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Modern Slavery Act 2015 Statement

Introduction

This statement is made pursuant to 54 (1) of the Modern Slavery Act 2015 and constitutes Simon Safety's slavery and human trafficking statement for the current financial year. The Modern Slavery Act 2015 requires larger companies to be transparent about their efforts to eradicate slavery and human trafficking in their supply chain. This statement, in accordance with the Act, lays out our policies and practices around recognising and preventing human trafficking and slavery in our business and our wider supply chain.

This statement is supported by our existing **Corporate Social Responsibility Policy** (in particular section 2. Human Rights practices, which addresses slavery) and our **Ethical Trading Policy** (section 4.1 addresses involuntary labour, freedom to leave and the holding of employee "deposits"). All of which are available in the Policies section of our website: www.simon-safety.co.uk

1. Organisational Structure

Simon Safety is an independent PPE, Work Wear, Workplace Safety and Janitorial Distributor servicing customers across the UK and Ireland. Our combined annual turnover is in excess of £2.6m and we employ 21 people. Simon Safety have a dedicated purchasing team, and this team is responsible for the selection and appointment of all suppliers. This includes checking the source of products and inspecting the supplier's manufacturing facilities.

2. Supply Chain Transparency

Although suppliers to Simon Safety are from many different countries, nationalities and cultures, our **Ethical Trading Policy** represents Simon Safety's commitment to source goods and services only from persons and firms that achieve internationally recognized standards and practices in dealing with their workers and their working environment.

Simon Safety only agree to source products from companies who respect the standards laid down by the World Trade Organisation and UN Human Rights Initiative.

Simon Safety operates in a way which maintains acceptable practices with regard to their staff and the environment and requires its stakeholders to perform in the same way.

We accept that some of our suppliers source materials and finished goods from countries where there are cultural and legal differences however we do expect and require that they consider these differences when they carry out their own business and we purchase from only those who do. Certain practices including the use of slave, bonded or child labour are unacceptable.

We expect our employees to be treated fairly, work reasonable weekly hours with proper regard for their human rights and social conditions, with freedom of association and without fear of exploitation, discrimination or harassment.

All employees should earn at least the minimum legal wage or minimum established within the industry to provide for basic living requirements. Simon Safety will not knowingly engage with any suppliers that operate poor labour practices that breach our code of conduct and we reserve the right to audit suppliers where we consider necessary.

With the introduction of the Modern Slavery Act Simon Safety has committed to contact all nominated suppliers to ensure their ongoing commitment to the new legislation and will remove any suppliers unable to demonstrate compliance.

3. Rights to Work in our Businesses

Simon Safety is committed to ensuring that right to work checks are carried out consistently and diligently in line with current U.K. legislation. Copies of documents are retained on the personnel file, with regular audits carried out to ensure that all sites are compliant with our internal procedures. Guidance relating to the importance of all pre-employment checks is provided to line managers along with training to ensure that illegal working is prevented.

Following the completion of satisfactory background checks, all Simon Safety employees are given contracts of employment at the start of the employment relationship. These are given to the employee for review, then signed by both the employee and Simon Safety, clearly stating the

terms and conditions of engagement, and the voluntary nature of employment. Employees have the freedom to leave our employment at any time (subject to contractual notice) and any overtime in excess of standard contracted hours is also voluntary.

4. **Employment Agencies**

Employment agencies contracted to supply temporary staff to Simon Safety shall demonstrate commitment to and application of the requirements of this code.

Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to Simon Safety are eligible to work in the UK by:

- 4.1. Following Immigration and Nationality Directorate Guidelines on Amendments to Section 8 of the Asylum and Immigration Act 1996.
- 4.2. Ensuring that the requirements of the Immigration and Asylum Act 1999 Section 22 Code of Practice are met.
- 4.3. Retaining copies of identity papers, work permits or passport stamps as detailed in the Home Office List of Specified Documents and UK Passport Stamps.

Employment agencies contracted to supply temporary staff shall ensure that all staff supplied to Simon Safety have sufficient command of English to understand:

- 4.4. The agency's responsibilities under this code of practice.
- 4.5. Simon Safety Health & Safety requirements.
- 4.6. Written statements of employment particulars.
- 4.7. Or have other measures in place to ensure that all these requirements are communicated in the employee's native language.

5. **Our Responsibilities**

Simon Safety are committed to working only with suppliers and manufacturers who do not comprise the basic human rights of their employees. We seek to develop business relationships with suppliers who have a respect for our ethical standards in the context of their own particular country's region's culture. In order to achieve our objective, we set high standards of behaviour for ourselves and that of our suppliers and stakeholders. We feel it is important for us to have our own strict policy on Ethical Trading and to make our suppliers aware of this so they

understand our business values. We require our suppliers to be able to trace the social impact they cause by their operations locally and further afield from the sourcing of raw materials and goods through to all levels of manufacturing, distribution and sales. This is detailed in our **Ethical Trading Policy**.

If we find out that a supplier has breached our ethical trading policy, we work with them to try and resolve the issues. We believe it is more beneficial to over-come these issues rather than cease trade with them straight away. By working with suppliers to overcome their ethical issue we are securing the long-term security of their community.

Any suppliers not willing to work with us in this way will ultimately suffer the result of us ceasing trading with them.

In compliance with our ethical trading policy contracts and agreements are made clear in writing for the avoidance of doubt or question.

All employees will be provided with ethics training as part of their induction programme and ongoing ethics training, as the ethics policy and procedure develops will be cascaded to all employees.

6. **Summary and Accountability**

Both our Ethical Trading and Corporate Social Responsibility Policies support the fact that we do not condone child, forced, indentured or bonded labour but seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in our policies reflect our position related to but not limited to slavery, human trafficking, antitrust, anti-bribery and anticorruption and protection of the company's assets and reputation.

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.