

Modern Slavery Policy Statement

Leadec Limited has 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 2018 to 31 December 2018.

We are a leading supplier of industrial services to the automotive and transport industries. Our expertise consists of both hard and soft Facility Management disciplines and technical services such as Paint Shop Cleaning, Surface Treatment and Component Assembly. As at 31 March 2019, we had 2463 employees.

Tackling Modern Slavery within Leadec Limited

We have a number of policies and procedures in place that apply to all employees working for Leadec Limited 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).
- 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.

In addition to the above, we also have a **Whistleblowing Policy** 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 the Leadec Management, the Human Resources Department or alternatively through the procedure for making a protected disclosure.

We have introduced a Right to Work app within our Head Office function, which will enhance and ensure a more robust recruitment process. We propose to roll this out across our entire business by the end of June 2019. This will not only ensure that any new starters have the correct documentation to work in the UK, but also provide an additional layer of assurance and governance in line with our obligations in respect of the Immigration, Asylum and Nationality Act 2006.

Tackling Modern Slavery within Leadec Limited'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 to a requirement during the onboarding process to accept the Leadec Conditions on 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.

In December 2018 Leadec introduced a new cloud based supplier onboarding process, 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 to be in place.

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.

This statement was approved on 30 April 2019 by the Leadec Board of Directors, who review and update this statement annually.

A handwritten signature in black ink, appearing to read "Phil McClennon".

Phil McClennon, Chief Executive Officer of Leadec Limited:

Date: 30.04.19

A handwritten signature in black ink, appearing to read "Claire Gathercole".

Claire Gathercole, Financial Director of Leadec Limited:

Date: 30.04.19