

MODERN SLAVERY STATEMENT

Business Organisation, Structure and Supply Chain

The Stannah Group (including Stannah Stairlifts Limited and Lift Services Limited) operates internationally across supply chain, manufacturing and sales distribution. We directly employ a large number of people internationally and maintain relationships with many different organisations.

We are committed to acting ethically and with integrity in all our business dealings. We sum up this approach with the words 'We take care'. This is the essence of our brand – our central organising principle and we use it to guide everything that we do.

Policy

We are committed to opposing modern slavery in all its forms and we expect the same attitude from all other organisations with which we do business. The Group realises that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

We will ensure that everyone in our business and our business partners know our behavioural standards. We will avoid doing business with those who do not accept our values and who may contravene our policy.

This policy supplements other existing policies and documents to provide guidance and transparency for all employees. These include (but are not limited to):

- Ethical behaviour policy
- Sustainability and environmental policies
- UK Bribery Act policy
- CIPS Code of Conduct for Purchasing Professionals Public
- Disclosure (whistle blowing) policy

The Group Directors and Senior Management have the responsibility for implementing this policy and its objectives and will allocate resources (people, training, time) as required. We will regularly review, report on and update this policy in line with our financial year end of 31 December. This statement covers the period August 2019 to August 2020.

Risk Assessment and Due Diligence

We recognise modern slavery can happen anywhere, which is why we will provide all budget holders and financial decision makers with awareness training.

However, we recognise our extended supply chains present the greatest levels of risk.

Our ethical approach to business infers that we prefer to source as locally as possible. However, we recognise our supply chains are inevitably international by nature and can therefore be challenging to manage.

We invest in relationship management throughout the Group so that we can foster long-term relationships with suppliers and contractors to understand their business, regularly visiting and reviewing key suppliers and mitigating risks where appropriate.

Awareness Training

Raising awareness of modern slavery, both within our business and our supply chains, is an important part of our strategy. We know that identifying potential and actual cases requires upskilling colleagues and suppliers to understand the drivers of modern slavery as well as the possible indicators.

We regularly educate relevant employees in ethical business policies, corporate social responsibility and the UK Bribery Act and include whistleblowing policies and procedures. Since the launch of our modern slavery policy in 2017, we have incorporated modern slavery awareness training into our regular ethical business training programme for all employees.

We train all purchasing professionals to the Chartered Institute of Purchasing and Supply qualification and we have added a detailed training module to cover aspects of modern slavery not covered by the above, for relevant employees and business leaders.

Effectiveness

During 2018/19, Stannah identified no instances of modern slavery in its supply chains.

Plans for 2019/20

In the next 12 months, we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chain and ensure that our strategy is responsive to changing risks. We will act immediately to address all concerns that are identified.

Own business and operations

- Regularly review and update our internal modern slavery blog for all employees.
- Continue to expand our training programs to provide targeted training to key employees, budget holders and financial decision makers in the business.
- Complete the modern slavery e-learning training roll-out to all appropriate employees through a SCORM compliant Moodle course, to provide them with useful information on the different types of slavery, how to recognise the signs and key contact details.

Supply chains

- Help build awareness and understanding of modern slavery among suppliers and other partners across our supply chain and presenting to new key suppliers (who manufacture or source the majority of our product).
- Evaluate modern slavery and human trafficking risks of each new supplier through our approval process.
- Continue to work with our suppliers to resolve any issues identified and report the outcomes to business leaders.
- Assess existing suppliers, which have a greater degree of focus on slavery and human trafficking, where general risks are identified.
- Act against suppliers that fail to improve their performance in line with our requirements, including termination of the relationship.
- Regularly review and update, where necessary, existing legal contracts and general purchasing terms and conditions with suppliers and contractors to include clauses pertaining to modern slavery and risk factors.



Jon Stannah
Group Managing Director