

MODERN SLAVERY STATEMENT

This statement is made on behalf of Glen Dimplex Home Appliances Limited ("GDHA") pursuant to Section 54(1) of the Modern Slavery Act (the "Act") and constitutes its slavery and human trafficking statement. GDHA is a part of Glen Dimplex Consumer Appliances Division.

GDHA is a limited company registered in England and Wales (company number 02692306).

For the year ending 31st December 2021

Introduction from the Chief Executive Officer

As a key manufacturer and provider in the domestic appliance sector, we always work to the highest ethical standards and ensure that we comply with all laws, regulations and rules that are relevant to our business.

Slavery and human trafficking are totally unacceptable and we will not tolerate forced labour of any description within our business or in our supply chains. We recognise our moral and legal responsibility to help prevent modern slavery and human trafficking and commit to taking robust and effective steps to ensure no such activities arise in the operation of our business.

The aim of the business is to achieve the highest ethical standards in this regard and as a minimum, we will comply with all relevant legislation. We all have a responsibility to be alert to the risks of modern slavery and human trafficking, however small, in all daily activities. With that in mind, all employees are expected to report to management any concerns they may have in this regard and managers are expected to act upon any concerns raised without delay.

This statement sets out the action we have taken to identify, understand and address all risk of modern slavery and human trafficking in our own business and in our supply chains. It also sets out the steps we have put in place aimed at ensuring that there is no slavery or human trafficking in the business or supply chains.

Organisational Structure and Supply Chains

GDHA is a manufacturer of major domestic appliances. We manufacture free-standing, built-in and range cookers, as well as both gas and electric hobs. The organisation has manufacturing and warehousing facilities in the UK and we operate from sites in Prescot on Merseyside, Buckley in Flintshire and Trentham Lakes in Stoke-on-Trent.

In addition to our operations in the UK, we also purchase many other medium domestic appliances from third party suppliers overseas, including but not limited to fridges, freezers, dishwashers and washing machines, for distribution to customers in the UK. We also buy components for use at our UK manufacturing sites. Our current supply chains operate across Europe and Asia.

Responsibility

- **Overall:** The Chief People Officer has been appointed as the key contact for issues relating to modern slavery and human trafficking within its UK operation. The Purchasing Director has been appointed as the key contact for modern slavery and human trafficking issues within supply chain.
- **Policies:** It is the responsibility of the People and Culture, Purchasing and Quality Departments to ensure that relevant policies are in place for the areas of the business that are at risk of coming into contact with slavery or human trafficking. They are also responsible for ensuring that the policies are periodically reviewed and, when appropriate, updated.
- **Risk assessments:** For supply chain, the Purchasing Department are responsible for carrying out the modern slavery and human trafficking risk analysis.

Relevant Policies

GDHA has in place the following policies that sets out its approach to the identification and prevention of modern slavery and human trafficking within the business and its supply chains.

- **Modern Slavery Policy:** The policy reflects the business' commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- **Whistleblowing Policy:** The business encourages all employees, workers, customers and other business partners to report any concerns related to activities within the business or in its supply chains. This includes any circumstances that may give rise to an increased risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Anyone who has a concern can contact our Chief People Officer on a direct number which is included in the Whistleblowing Policy.
- **Purchasing Code of Conduct:** The business is committed to ensuring that suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide their workers with safe working conditions, treat them with dignity and respect, and act ethically and within the law in their use of labour. The business will work with suppliers to ensure that they meet the standards of the code and, where necessary, work with them to improve their worker's working conditions. Serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship (as described in the "Code of Business Ethics and Conduct").
- **GDHA Code of Business Ethics and Conduct:** The Code sets out the standard of ethical conduct we expect from suppliers. All suppliers are expected to sign up to the Code and to ensure that they comply with it. The Code also sets out the implications for a supplier of acting in breach, including termination of the business relationship.
- **Anti-Bribery Policy:** The business will act in accordance with its obligation under the Bribery Act 2010 to prevent and prohibit bribery and to ensuring that the highest standards of professional ethical conduct are maintained.
- **Agency Workers:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Suppliers of Agency labour in the UK Operations are Gangmasters Licensing Authority ("GLA") registered.

Due Diligence and Compliance

As part of the business' initiative to identify and mitigate risk, it will undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers against the same criteria. The due diligence and reviews include:

- Assessing whether or not particular activities, countries or regions are high risk in relation to slavery or human trafficking by conducting supplier audits or assessments. As part of the routine audit we take into account a number of factors, including the ages of the workers employed by the supplier and their working conditions;
- Taking steps to improve substandard suppliers' practices, including the provision of advice to suppliers through the audit process and face to face meetings on their premises;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship;
- In addition, suppliers are requested to confirm in writing that they shall adhere to the Code of Business Ethics and Conduct.

Measuring Performance

In order to measure the business' effectiveness in ensuring that modern slavery and human trafficking is not taking place within the business or supply chains, we have:

- Reviewed the training programmes which are being undertaken within the Supply Chain and will carry out periodic reviews in line with our training calendar
- Developed a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Conducted a review of its existing supply chains, whereby the organisation has evaluated all existing suppliers.

Training and Raising Awareness

The business requires that all key staff within our supply chain complete training on modern slavery to ensure that they understand the risks of modern slavery and human trafficking infiltrating the business or its suppliers. The organisation will continue to raise awareness via various communication methods including displaying posters and circulating emails. Additionally, we periodically review internal policies and procedures and will, in particular, review them in the event of any major organisational changes, the introduction of new legislation or in the event of any breach of the policy.



Bryce Dyer

Chief People Officer, Glen Dimplex Consumer Appliances

(signing on behalf of GDHA)