

Our Commitment

At Exyte Hargreaves we are committed to preventing modern day slavery and human trafficking throughout our operations and those associated with our business. Each year we will review our operations and present an annual statement in accordance with the Modern Slavery Act 2015.

Our business and Supply Chains

Exyte Hargreaves is a leading European mechanical HVAC engineering and manufacturing business operating across all high integrity and complex building sectors with an annual turnover of £33.7 million. We are a Regional Specific Business within the EMEA Region of the Exyte Group whose head office is in Stuttgart, Germany.

Exyte Hargreaves primarily operates in the UK and directly employs over 300 people in two distinct areas Manufacturing and Engineering Delivery. In addition to our direct employees we have a varied supply chain providing labour, goods and services to manufacturing and engineering delivery. Over 75% of our spend in 2018 was on the procurement of raw materials, sub-contractors and labour. In order to mitigate the risk of modern day slavery and human trafficking within our supply chain we work closely with them to help identify areas of high risk where modern slavery could occur and work in partnership with them to help ensure its prevention.

Responsibility for Anti-slavery Initiatives

The Exyte Hargreaves Senior Leadership Team are responsible for ensuring that we comply with our legal and ethical obligations around modern day slavery and human trafficking and that all those under our control comply.

Our Procurement, HR and Labour Management teams have primary and day-to-day responsibility for compliance with our Anti-Slavery Policy through our People and Supply Chain policies and procedures. In addition, it is the responsibility of all Exyte Hargreaves employees to be aware of and report any suspected incidents of unfair treatment either within our business or within our supply chain.

Our Policies

We continually assess our responsible business processes and have appropriate whistleblowing procedures in place to ensure their continued effectiveness. In 2016 we adopted our Parent Company's Anti-Slavery Policy and implemented requirements with regards to Modern Slavery within our procurement process.

During 2018 we became a Regional Specific Business within the EMEA Region of the Exyte Group and undertook a review of our existing policies and have made updates to more explicitly cover our ethical labour stance.

Our current suite of policies consist of:

- Sustainable Procurement Policy;
- HR Policies covering labour and employment standards;
- Anti-slavery Policy.

Our Policies are developed by experts in the subject and approved by the Senior Leadership Team. They are part of our externally certified management systems and communicated to all personnel.

Risk Assessment

Our risk assessment indicates that our exposure remains unchanged and is highest within our supply chain. We have carried out a review of our supply chain looking at the goods and services we procure and the supplier categories that we believe pose our highest risk are those who provide labour which is consistent with industry insight.

Due Diligence of Suppliers

In 2018 we continued to focus on developing our strategy to ensure that Modern Slavery and Human Trafficking is embedded within our current processes and policies. The primary focus being on high value and/or high risk areas of our supply chain.

During the forthcoming year we will continue to vet all new suppliers as part of their onboarding process and continue to review all existing suppliers to ensure that they are suitably vetted for modern day slavery and human trafficking.

To facilitate our due diligence we continue to roll out a training programme to raise awareness of modern slavery to ensure everyone recognises the signs and what to do if they encounter it.

KPI's

- 0 cases reported
- 100% of direct and indirect employed will be compliant with the living wage.

Based on annual spend of £20m we have covered 75% of our spend

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2018.

Signed:



(Mr. A Sneyd)

Position: Managing Director

Dated: May 2019