

Modern Slavery and Human Trafficking

Introduction from the Chief Executive Officer

Slavery and human trafficking are blight on our global society and we will not tolerate forced labour of any sort within our operations. We all have a responsibility to be alert to the risks, however small, both in our businesses and in the wider supply chain. Employees are expected to report any concerns and management are expected to act upon such concerns without delay.

Modern Slavery and Human Trafficking Statement

This Statement is prepared in order to give guidance and instruction on the minimum standards acceptable to our UK businesses in the manufacture of components and raw materials supplied to our companies and of finished products.

The Company recognises its moral and legal responsibility with regards to modern slavery and human trafficking and will endeavour to ensure no such activities arise in the operation of our business. Our aim is to achieve the highest ethical standards with regards to modern slavery and human trafficking and as a minimum, we will comply with all relevant legislation and we will achieve this with the cooperation of all our staff. All our UK businesses comply with the BDR Thermea Group's Ethical Code of Practice for Supply Sites Outside of the European Union.

Continual improvement in the area of business ethics is supported by the measurement of our performance by both internal and external auditing and reporting. Additionally, management will periodically review this policy and will do so especially in the event of any major organisational changes, new legislation or serious breaches of the policy.

The Organisation

Within the UK, our business offering includes domestic & commercial gas appliances, hot water cylinders, gas & electric water heaters and low carbon solutions that are specifically designed to make life more affordable and comfortable for as many people as possible. The UK businesses are part of the BDR Thermea Group.

In our UK operations the majority of personnel are employed on permanent contracts, while we also utilise the services of people via agencies and sub-contractors. During the coming months, the Company will focus on the supply into our business of agency labour and we will be working closely with our preferred suppliers of agency workers to examine closely this sector for indicators of modern slavery.

Our Supply Chains

Our supply chains include local, national and international partners and the Company will not knowingly do business with parties who violate applicable laws and regulations, including local, environmental and employment laws.

Business Objectives

1. The elimination of modern slavery and human trafficking within our business operations through effective corporate governance.
2. The provision of effective training relating to modern slavery and human trafficking issues for all relevant personnel ensuring all relevant personnel understand their role and expected behaviour.
3. To ensure modern slavery and human trafficking is an agenda item at Executive meetings on an annual basis so that the above arrangements remain suitable for the needs of the business.
4. To ensure that adequate resources are made available to meet these objectives.

Assessment

The UK businesses, via its parent group BDR Thermea, subscribe to external assessment of its labour, procurement and sustainability practices. The external assessment encompasses the following auditing strands:-

Social: covering the health and safety of employees, working conditions, labour relations, career management, child and forced labour, freedom of association.

Ethics: covering corruption and bribery, anti-competitive practices, fair marketing.

Environment: covering energy, water, biodiversity, local pollution.

It is the intention of the Company to achieve and maintain, as a minimum, standard compliance in respect of this assessment. It is a requirement that all suppliers submit to assessment and achievement of the basic standard and it is the intentions of the Company to have all of its suppliers achieve at least the minimum standard of compliance in respect of the assessment.

The assessment enables us to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training to relevant personnel. This training is to become more focussed and will be mandatory for appropriate managers.

Protection

Employees, agency workers and contractors who wish to raise any issues with regards to the Company's business practices, in particular those relating to modern slavery and human trafficking, can do so under the protection of the Company's Whistleblowing Policy. Such matters can be raised with either a manager, a member of the Human Resources Team or a relevant external agency including the Police, Public Concern at Work and any Public Authority.

Review

This statement, the Company's Modern Slavery policy and relevant procurement practices are reviewed on an annual basis and the Company is committed to communicating changes effectively.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31st December 2019.



David Pinder
Chief Executive Officer
Baxi UK & Ireland

Date: 28th of March 2019