



Anti-Slavery Guidance

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This statement explains the steps that STILL UK have taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business. This document sets out the policy of STILL UK (the 'Company') with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act.

The UK HR Manager is responsible for ensuring that the statement is published and reviewed on an annual basis.

1. Structure of the organisation

STILL UK is made up of 225 employees working at throughout the UK. The business is involved in the sales and service of Fork Lift Trucks. The majority of this equipment is produced in our factories in Germany, France and Italy. The UK purchases the equipment through other companies in the Group. We have a supplier base which consists of 693 suppliers based in the UK, with 674 based in other EU countries and some outside of the European community.

2. Our policy

The Company has a zero-tolerance approach to modern slavery. It is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our Company or those of its suppliers.

3. Policy Enforcement

This policy has been issued throughout the business and has been incorporated into our terms of business with our suppliers. This policy is designed to comply with the Modern Slavery Act 2015.

The Company is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and the Company is evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The Company expects its suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with the Company's procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all employees' obligations under their contract of employment.

Whilst recognising the Company's statutory obligation to set out the steps it has taken to ensure that modern slavery and human trafficking is not taking place in its supply chains, the Company acknowledges that it does not control the conduct of individuals and organisations in its supply chains. To underpin its compliance with practical steps, the Company has implemented the following measures:

- conducted a risk assessment to determine which parts of the business and which of the Company's suppliers are most at risk of modern slavery so that efforts can be focused on those areas;

- engaged with the Company's current suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- introduced supplier pre-screening as part of our tender process;
- introduced contractual provisions for the Company's suppliers to confirm their adherence to this policy and accept the Company's right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

At the end of the financial year 2017 the Company will include in the directors' report, accompanying its annual financial statements, a reference to the Company's Slavery and Human Trafficking Statement, which will be presented on the Company's website during the course of 2017.

4. Assessment of risk and methods of managing it

Using the Chartered Institute of Purchasing and Supply's guidelines a list of suppliers has been compiled consisting of 693 suppliers. Of these 674 are based in the UK, 19 based within Europe and 0 based outside of Europe. Those outside of Western Europe are seen as higher risk. The suppliers are also assessed whether the purchasing is carried out centrally or at Head Office in the UK or Germany. These suppliers have also been assessed with regard to the size of spend. The larger the spend the higher the risk.

The suppliers have then been categorised according to whether they are active suppliers where business has been conducted during 2016 or inactive, where no business has been carried out since 31 December 2015.

All inactive suppliers will be blocked and the company will be unable to use them until a full anti-slavery assessment has taken place.

Those suppliers who are based outside of Western Europe, with high spend and where the company has conducted business with in the last 12 months are seen to be the highest risk and have been targeted first.

The Managing Directors of all the active suppliers have been contacted in writing and advised about our Anti-slavery policy and the Company's zero tolerance approach to modern slavery. They have been advised that in order to continue our business relationship with them that we expect them to act at all times in a way that is consistent with our Policy's aims. They have been advised that we expect the same standards from all of our contractors, suppliers and other business partners and that we need to gain an understanding of the measures that they have taken to ensure modern slavery is not occurring in their business or in that of their suppliers. The suppliers have been requested to complete an assessment return which outlines the measures that they have put in place.

Where purchasing is carried out within the Network companies a supplier assessment will be carried out. As many of the suppliers as possible will be organised through the head office. Where this is not possible then terms of engagement will be provided and individuals will be trained on the pre-screening and blocking process.

5. Employee Training

The company's policy has been brought to the attention of all current employees, when the policy was issued in April 2017. For new employees the policy forms part of their induction programme. Managers with specific responsibilities for the supply chain have had more in depth training with further training available when necessary.

6. Monitoring and review process

The screening process will be rolled out to all 'active' suppliers at a date in the future. These reviews will fall in line with the existing review process which is carried out by the Purchasing Manager and Quality Manager based on the supplier's expiry dates for any of the following:

- ISO accreditation
- Public Employer Liability insurance
- Other Industry accreditations
- Company concession

7. Additional action points

The Company is also committed to:

- Ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility;
- Ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure;
- Carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK;
- Ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of our suppliers and sub-contractors also operate in accordance with the Act.
- Appointing the UK HR Manager to oversee the compliance with the Modern Slavery Act 2015;
- Identifying and addressing any areas of high risk in our supply chain;
- Providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking;