



AKW Holdings

Modern Slavery and Human Trafficking Statement

Issued: April 2022
Reviewed: May 2023

This statement constitutes AKW Holdings Group Modern Slavery and Human Trafficking statement, pursuant to s.54 of the Modern Slavery Act 2015 and is reviewed on an annual basis.

This statement relates to actions and activities during the financial year 1st January 2022 to 31st December 2022.

This policy applies to AKW Holdings and all its subsidiaries. AKW Medicare Limited is a subsidiary of DLP Limited ('DLP'), a company incorporated in the Isle of Man, both of which are owned by the AKW Holdings Limited group ('Group') which is also Isle of Man based. AKW in turn has a subsidiary, AKW International SA, incorporated in Belgium and AKW Resource Centre, incorporated in the USA. Contour Showers Limited is a subsidiary of Elfreed Limited. Elfreed Limited is a subsidiary of DLP Limited.

The organisation respects human rights and does not tolerate any form of modern slavery.

We recognise that no supply chain is without risk of modern slavery and it is our responsibility to take a robust approach to ensure we understand these risks and work in partnership with our suppliers to mitigate them. We are committed to ensuring that no slavery or human trafficking occurs within our organisation or our supply chain.

Organisational structure and supply chains

The organisation's principal activity is the wholesale supply of showering and associated products for the assisted-living market in the UK.

The organisation's procurement department is centrally located at DLP which sources both raw materials and finished goods from a wide range of geographic locations, including the UK, Europe (France, Italy, Spain), Near East (Turkey) and Far East (China). The organisation actively manages all supplier relationships on a continuing basis and has detailed policies and procedures in place to help ensure that it only transacts with reputable and ethical organisations.

Policies and procedures

Anti-Slavery policy: our Anti-Slavery Policy reflects our commitment to act ethically and with integrity in all business relationships and to implement and enforce appropriate and effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere within our business and supply chains. This policy is reviewed on an annual basis. We expect organisations with whom we do business to adopt and enforce policies to comply with the legislation. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values. We seek to treat everyone with equity, creating a workplace and business environment that is open, transparent and trusted and we encourage and support our people and

customers to address any issues and raise any concerns with management, arising from modern slavery. Employees in China, employed by the organisation inspect our suppliers for product quality and the treatment of staff.

Recruitment and employment procedures: 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. Robust recruitment processes are in place in line with UK employment laws, including 'right to work' document checks, contracts of employment and checks to ensure everyone employed is 16 and above. Market related pay and rewards are reviewed annually. Wellbeing activities and engagement initiatives are used to support our people's physical and mental wellbeing and lifestyle choices.

Anti-bribery and corruption policy: The organisation does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The Directors and senior management team are committed to implementing and enforcing effective systems throughout the organisation to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Whistleblowing policy – The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to enhance risk of slavery or human trafficking.

Expected conduct standards – The organisation makes it clear to employees, the actions and behaviour expected of them when representing the organisation in the Employee Handbook. We strive to maintain the highest levels of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

High-risk activities

The organisation does not participate in any activities considered to be at high risk of slavery or human trafficking.

There have been no investigations in relation to known or suspected instances of slavery and human trafficking.

Due diligence and risk assessment process

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. This process includes an assessment of whether or not particular activities or countries are high risk in relation to slavery or human trafficking. The organisation's due diligence and ongoing reviews include:

- Completion of supplier pre-authorisation questionnaires which have a detailed section regarding corporate social responsibility and the potential supplier must advise the policies and procedures that it adheres to, to ensure it meets the required standard. This includes labour, ethics, health & safety, environmental and anti-bribery policy adherences. If the supplier is deemed not suitable due to non-adherence, then they will not be engaged.
- Key Directors and / or members of the senior management team periodically visit the factories and headquarters of the organisation's key suppliers. These visits help to develop and strengthen supplier relationships and provide the organisation with first-hand insight into the operations and working conditions in place at each of the suppliers' respective businesses.
- Employment of staff is conducted directly in China and is overseen by the organisation.. Their role is to ensure that the quality of manufactured products is in line with business requirements, and they also provide a direct day-to-day operational link, with suppliers.
- Assessment of the supply chain is performed to evaluate products and geographical risks of modern slavery and human trafficking.
- Evaluation of the modern slavery and human trafficking risks of each new supplier is part of our supplier take on process.
- Undertake supplier audits and assessments at supplier selection time as well as follow-up if required due to any performance and/or quality standards shortfall and by default at least every 3 years with a greater degree of focus on slavery and human trafficking where general risks are identified; (i.e geographical area, etc.).
- Maintenance of an annual risk profile for each supplier as per procurement compliance review.
- Use of internet search engines to research supplier history and checking for their labour standards, compliance in general, and in particular, any risks related to modern slavery and human trafficking.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- Requiring staff working in specific countries/supply chain managers/HR professionals to have attended training on modern slavery.

Training

We provide appropriate training to our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business. The organisation has delivered training and information to senior leaders and employees on Equality & Diversity. This has enabled more awareness across the Group.

Forward Looking Plans

Going forward, we aim to work with our suppliers and partners to continually improve our procedures and processes in relation to promoting human rights and reducing modern slavery risk and will report on our progress each year.

In addition, we will provide further focused training for those in the organisation involved in contracts, procurement and employment-related activities as part of ongoing development. Modern Slavery and Human Trafficking will be covered as a section in Induction, to ensure awareness to all employees.

The organisation has relevant supply agreements in place for all Far East and non-UK suppliers deemed necessary. The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics.

The organisation will continue to develop a system for supply chain verification in place since 2015, whereby the organisation evaluates potential suppliers before they enter the supply chain by visits, audits and compliance pre-supply questionnaires.

The organisation will review its existing supply chains on a regular basis and evaluate all existing suppliers by performance monitoring exception reporting.

Approval

This statement was approved by the Group CEO of AKW Holdings Limited.

DocuSigned by:
Nick Parsons
.....C923DA19E95F4EB.....

01.05.2023
.....

NJ Parsons

Date