



Anti-Slavery and Human Trafficking Statement for Reflexallen UK Limited

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Reflexallen UK Limited ("Reflexallen UK" or "We") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our company or supply chain.

1. Policy Statement

- 1.1 Modern slavery is a crime and a violation of human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Reflexallen UK has a zero-tolerance approach to modern slavery and we are 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 in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring that 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. We expect the same high standards from all of our contractors and other business partners. As part of our contracting processes we ensure against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

2. Relationships with suppliers

- 2.1 We actively manage our relationships with our suppliers and take steps to ensure we have transparency in our supply chain. As part of our initiative to identify and mitigate risk of slavery and human trafficking occurring in our supply chain we are reviewing our request for quotation process and the contractual terms we have in place with our suppliers to place more stringent obligations on our suppliers to comply with all applicable laws, statutes and regulations.
- 2.2 Our policies cover our commitment to ensure human rights standards are met globally and making sure our suppliers uphold similar standards. This is embedded within our global policy framework.

3. Recruitment and employees

- 3.1 All employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents are required to adhere to our Anti-Slavery and Human Trafficking Policy. All employees are encouraged to report any act, treatment of workers or working conditions within our company or any tier of our supply chain that they feel constitutes any of the various forms of modern slavery, to their manager, or the Human Resources Department. We undertake a "right to work"

check on all direct employees prior to them commencing their roles in our company. This includes, where applicable, that the employee has a valid visa and is of an appropriate age to work.

- 3.2 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under Anti-Slavery and Human Trafficking Policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
- 3.3 We continue to ensure staff have a high level of understanding of the risks of modern slavery and human trafficking via regular training.
- 3.4 Our policies are made available to employees in English. These can be accessed through our employee intranet and are made physically available at our operational sites and office locations. Our policies and business conduct expectations are a core part of our employee on-boarding and induction experience.

4. Our future plans

Over the next twelve months We intend to:

- continue to deliver training to employees in the roles most likely to be in a position to identify and address modern slavery risk;
- review our procurement process to ensure any potential supplier is aware at a very early of its obligations to at all times act ethically. All potential suppliers will need to specifically confirm they comply with our code of conduct and are in full compliance with the Modern Slavery Act 2015 before We formally engage with them.

Signed

Renzo Gibellini
Chief Executive Officer
Reflexallen UK Limited

Last update - March 2019