

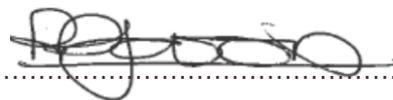


CONTECHS
LIMITLESS POSSIBILITIES

Modern Slavery Statement - Contechs Holdings Limited ("Contechs")

This statement is made as part of Contechs' commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act). It summarises how Contechs operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year ending on 31 December 2017. It was approved by the board of directors on 26 August 2018.



Peter Jarvis
Managing Director



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Background

Modern slavery is a crime and violation of human rights and we as a business is committed to the prevention of modern slavery within our supply chain and our business.

Contechs has a zero-tolerance policy in respect of modern slavery and promotes honesty, integrity and ethical practices in its business. Contechs is fully committed to implementing change and enforcing systems to prevent, avoid and combat modern slavery within its supply chain.

Our Business and its structure

Contechs is the holding company of the Contechs Group Companies. Contechs was founded in 1997 initially focussing on supply of engineering services to automotive suppliers.

Contechs has 9 subsidiary companies in the UK and Germany which undertake a variety of services including:-

1. The provision of Engineering Services;
2. Recruitment Services;
3. Manufacturing; and
4. Materials Handling.

Contechs has a global turnover of £55m per year.

Our suppliers

Due to the range of services which Contechs offers it works with suppliers across the globe in the supply of services and across Europe for the supply of goods. All individuals undertaking services on our behalf are known to Contechs and its staff. Contechs undertakes detailed due diligence in relation to all service suppliers before they may be approved to undertake services on behalf of Contechs.

Contechs maintains a Supplier Membership with Sedex Global who promote and support the use of responsible supply chains by facilitating the exchange of Ethical data from Suppliers and undertake ethical trading audits. Contechs also maintains a membership of the Recruitment and Employment Confederation which seeks to ensure that Recruitment Companies incorporate ethical and fair practices within their recruitment procedures.

Our policies

Contechs have a number of policies which incorporate its ethical practices to include:

1. Ethics Policy
2. Corporate Social Responsibility Policy
3. Anti-Bribery and Corruption Policy
4. Data Protection Policy
5. Whistleblowing policy

Contechs requires its Suppliers to adhere to its policies outline above.



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Contechs' Ethical trading policies are reviewed on a regular basis by its internal and external legal and HR advisors and any recommended changes are approved by the board of directors. The board of directors are responsible for these Policies. All reports of actual or suspected breaches of policies are reported to senior management or the directors in line with Contechs' policies.

Employees are encouraged to raise all concerns in confidence with senior management.

Risk Assessments

All Suppliers of Services to Contechs must complete a self-assessment due diligence questionnaire prior to being approved to provide Services to Contechs. All individuals undertaking services for Contechs are known to Contechs staff and communicate with Contechs directly.

In addition, where services are provided from Countries which are considered as being a high risk of modern slavery according to the Global Slavery Index e.g. China and India, Contechs undertakes site visits usually on an annual basis.

Suppliers of goods are generally sourced from Western European countries which are determined to be lower risk of being affected by modern slavery and only minimal auditing is undertaken – this approach has been reviewed over the course of the year and it is considered to be the appropriate level of auditing for these suppliers. However, our processes are regularly reviewed and if it is at any point determined to be insufficient or inappropriate we will review those procedures.

On rare occasions where goods are sourced from outside of Western Europe, we will undertake more detailed assessments. To date all suppliers within this category have had detailed ethical policies and reported rigorous practices for ensuring compliance separate audits have therefore not been necessary.

It is intended that over the course of 2018 that the board will review with our suppliers the possibility of introducing Key Performance Indicators in order to more effectively review our modern slavery monitoring.

Training

Contechs understands the importance of ongoing training and will ensure appropriate staff members are properly trained to recognise and understand, modern slavery, human trafficking and how and when to report any such practices.

Contact

Questions and comments regarding this statement are welcomed and should be addressed to hhunter@contechs.co.uk