

Modern Slavery Statement

Purpose

This statement is made in pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking.

This is the statement for the financial year ending 31 December 2020, which sets out Sicame UKs approach, processes and principles to combat slavery and human trafficking.

Sicame UK is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.

We confirm that we do not employ anyone under the age of 16 and that we do not support or endorse the use of child labour in the production of our products. We have ongoing practises to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Introduction

Our organisation structure and operations

Sicame UK Ltd is a private limited company incorporated in England and Wales and headquartered in Rochester, Kent. Sicame UK is a wholly owned subsidiary of Sicame SA, France.

Sicame UK is a manufacturer of a wide range of electrical distribution equipment that is used throughout the electrical distribution and supply industry. Sicame UK has a turnover of approximately £36 million and employs 110 employees.

Further information about the types of products manufactured, the number of people we employ and the countries we operate in can be found at www.sicameuk.com

Nature of our supply chains

Sicame UK is a global supplier of electrical distribution equipment. Our supply chains extend to Europe and Asia and Sicame UK remains committed to do all it can to eradicate any form of slavery or human trafficking from its business and supply chain.

Policies relating to slavery sand human trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment policy:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We ensure that:
 - All employees are on a written contract of employment.
 - All employees are able to join a trade union.
 - Temporary unskilled staff are under supervision from agency contractors.
- **Whistleblowing policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Code of conduct:** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Risk assessment and due diligence

To determine which parts of our own business and which parts of our supply chains are most at risk of modern slavery we will engage directly with suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains, and, where appropriate, agree how such measures should be enhanced.

Typically, high risk areas will include high-volume low-skilled areas of the supply chain.

We also seek to continually improve the performance of existing suppliers in relation to the risk of modern slavery and human trafficking.

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Staff training

We provide training to key staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

We make specific provision in our Whistleblowing Policy for the protection of those who whistle-blow in relation to an issue of modern slavery.

Our suppliers

Sicame UK conducts due diligence on all suppliers and vendors before allowing them to become a preferred supplier. Suppliers are regularly visited and to our knowledge, none of our selected suppliers use children in the production of any sourced component pieces. Sicame UK Limited also does not support or condone practices used by any companies that mistreat and abuse its workers. Initial screening takes place via vendor assessment which requires a written declaration to be submitted where the supply of a product is custom to our requirements a site visit will be undertaken.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
- We may terminate the contract at any time should any instances of modern slavery come to light.

Temporary labour

Sicame UK engages additional temporary labour from employment agencies in order to meet the need of our customers. Due diligence is periodically conducted on employment agencies being utilised and in addition to the above their written commitment to the prevention of modern slavery and human trafficking is obtained.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if, no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Monitoring of our anti-slavery policy and due diligence processes

We will monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains through regular interaction with them.

All Managers have the responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

Future action

We aim to take the following steps over the course of the next financial year:

- Revaluation of the selected suppliers.
- As appropriate, work with suppliers to develop improvement plans.
- Deliver further Modern Day Slavery Awareness Training to key customer and supplier facing personnel.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for Sicame UK, as it did for others across the nation.



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The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2019/2020 in line with the original publishing requirements.

Sicame UK concludes that the COVID-19 pandemic did not adjust the risk of modern slavery to a level above that which existed before the pandemic.

During the pandemic, Sicame UK employees still had access to the Grievance procedure and Whistleblowing policy to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid in accordance with Company Sick Pay entitlements and Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking.

No Sicame UK employees were placed on furlough during the pandemic.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Ian Steel
Managing Director

A handwritten signature in blue ink, appearing to read "Ian Steel".

Date: 29 January 2021

Date of next review: 08 January 2022