

SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

1. Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Locker Group takes to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Locker Group has a zero tolerance approach to any form of modern slavery. 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 our supply chain.

2. Potential areas of risk

Locker Group has positive and collaborative relationships with its partners and suppliers. However, those in Eastern Europe and Asia are not covered by European law and Locker Group have less oversight of their operations. This is mitigated by regular telephone and email contact and onsite visits.

3. Our policies

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.
- 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.
- Anti-bribery and Corruption policy. This explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- Corporate and Social Responsibility policy. This ensures that the business works ethically, sustainably, legally and maintains human rights. It extends the same expectations to its suppliers.

4. Our suppliers

Locker Group conducts due diligence on suppliers before allowing them to become a partner. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and on site audits which include a review of working conditions. Any failure by a supplier to redress any serious concerns may result in the termination of the relationship.

5. Training

Briefings have been given to the senior team and those involved with contracting with suppliers to ensure they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

6. Review

This policy will be regularly reviewed by the Board.

A handwritten signature in black ink, appearing to read 'Andrew Campbell', is written over the printed name.

Andrew Campbell
Chief Executive Officer
Locker Group Ltd

10th January 2017