

Modern Slavery Act (2015)

2019 Statement

Banham Patent Locks Holdings Limited

December 2019

Introduction

This statement is made by Banham Patent Locks Holdings Limited in compliance to section 54 of the Modern Slavery Act 2015 (MSA) and applies to all companies listed on our parent and subsidiaries structure detailed in our organisational structure.

This statement will be reviewed and updated annually to reflect the Group status and is available on our website or by request.

Slavery, servitude, forced labour, bonded labour, and human trafficking are issues of increasing global concern, affecting all sectors, regions and economies. Modern slavery is fundamentally unacceptable within our business and supply chain, and combatting it is an important element of our overall approach to business and human rights. Banham Group is committed to respecting, protecting and championing the human rights of all those who come into contact with our operations, including employees, supply chain workers, customers and local communities. We accept our responsibility to support transparency; to find and resolve problems, to regularly review our business practices, and to collaborate with others to protect their rights of workers, particularly those who are most vulnerable to abuses such as modern slavery.

Our Pledge

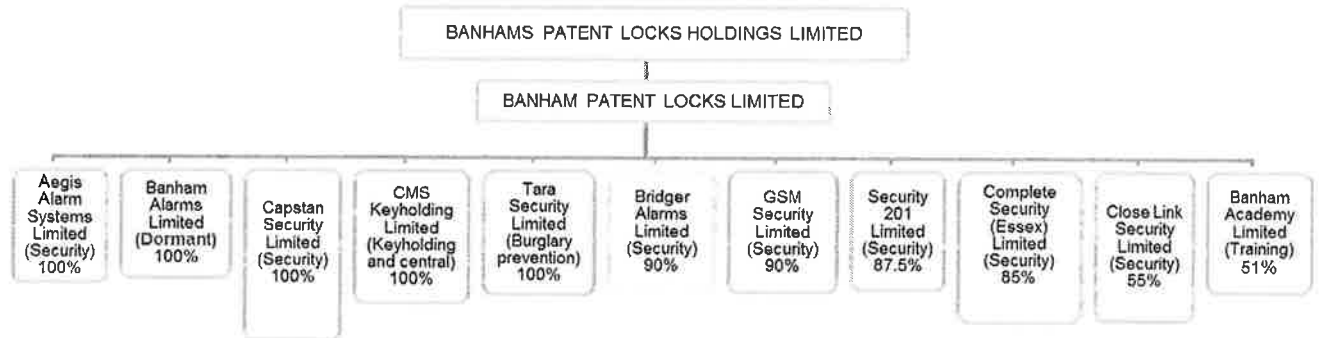
Banham Patent Locks Holdings Limited is committed to comply fully with applicable human rights legislation.

As part of our ongoing due diligence process which has taken place during the previous financial year, supplier approval is carried out throughout the Group. The following controls are being put in place to mitigate potential risk from within the Group and from those organisations, we interact with:

- We will define ownership of modern slavery processes at each of our companies and will work with them to implement this statement.
- We will strive to include modern slavery discussions within all our supplier visits.
- We will work closely with our supply chains to ensure compliance with legislative obligations and expect those organisations to have suitable anti-slavery and human trafficking policies and processes.
- We will request that our suppliers complete "Supplier Modern Slavery Self-Assessment Declaration".
- We aim to introduce independent modern slavery audits (especially in countries where the risk of modern slavery is much higher).

Our Organisation and its Structure

Banham was established in 1926 and sells, installs and services all types of locks, alarms, CCTV and other forms of security products. It operates in the UK and is primarily based in the South of England.



Relevant Policies

Banham Patent Locks Holdings Limited has clear policies in place to further mitigate and demonstrate our commitment to combating modern slavery and these policies are outlined below:

- Whistleblowing Policy

Banham Patent Locks Holdings Limited operates a whistleblowing policy. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in our supply chain. We aim to encourage every employee to speak up about genuine concerns in relation to criminal activity.

- Corporate Social Responsibility & Ethics Policy

Banham Patent Locks Holdings Limited is fully committed to being an equal opportunities employer. Trust, honesty and integrity are paramount to our organisation and we are opposed to all forms of discrimination.

- Anti - Bribery Policy

Banham Patent Locks Holdings Limited operates on an ethical basis in all of its activities and takes all reasonable steps to ensure bribery is prevented, either by those working for the organisation or associated with it, including third parties and agents. Banham Patent Locks Holdings Limited therefore has in place procedures and systems to prevent and detect corruption and bribery.

- Equal Opportunities Policy

Banham Patent Locks Holdings Limited are aware of issues relating to discrimination, harassment and victimisation and have taken the necessary measures to make sure it does not happen within our organisation. Banham Patent Locks Holdings Limited employees are paid above the living wage, which shows a commitment to avoiding labour exploitation within our businesses.

Managing Risk

Banham Patent Locks Holdings Limited does not wish to be associated with any organisation that either has or is found to be involved with either human trafficking or modern slavery. If we were to find evidence that one of our suppliers has failed to comply with Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and we would consider terminating our relationship should we see no substantial improvement in the way their business is conducted. We currently conduct limited audits on our suppliers from a modern day slavery perspective. However as part of Banham Patent Locks Holdings Limited efforts to monitor and reduce the risk of modern day slavery and human trafficking occurring through the supply chains, we will be sending out "Modern Slavery Self-Assessment Declaration" to our suppliers to reinforce and strengthen our commitment to eliminating modern slavery.

Supplier Adherence to our Values

In order to ensure that all persons within our supply chain comply with our values and zero tolerance policy on modern slavery, we have implemented a "Modern Slavery Self-Assessment Declaration" to assess and monitor our suppliers conduct. Banham Patent Locks Holdings Limited next phase is to introduce Modern Day Slavery supplier audits throughout the Group supply chain. We therefore expect our suppliers to comply with those provisions laid out in the act and hold their own suppliers to the same high standards.

Training and Awareness

In order to assess our effectiveness for preventing modern slavery, we will review and develop the following key performance indicators and will report them in future Modern Slavery statements:

- Implement training for key members of staff who manage supplier relationships and who are responsible for managing investments in companies who have a potentially higher risk of slavery, throughout the Group.
- Implement actions to strengthen our risk assessments and supply chain mapping.

Review Status

The following developments have been realized since the last review:

- a % of our suppliers have supplied us with Modern Slavery Statements.
- Training and awareness has been communicated to our sales and key purchasing staff members.

Moving into 2021, our objective is to continue to achieve the objectives set out in **Our Pledge**.

Board Approval

The Company Directors are responsible for implementing this policy and continually monitor the level of control required to prevent Modern Slavery and Human Trafficking taking place within the supply chain. This statement has been approved by the Board of Directors and is for the financial year ending 30th December 2020.

Contact

If you have any questions regarding this statement, please address these to tomward@banham.com

Company Name: Banham Patent Locks Holdings Limited

Name: Tom Ward

Position: Director

Signed:

Date: 07/12/2019

