

# MODERN SLAVERY ACT 2015

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chains. We are committed to acting ethically and with integrity in all our business relationships and enforcing effective processes and controls. Our Board and Senior Management Team recognize the importance of this statement and its objectives and shall further develop policies to safeguard against this taking place.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our human trafficking statement for the financial year ending 2018.

## OUR BUSINESS

The business was established in 1969 and we are a distributor of spare parts and finished goods in the home appliance retail industry.

## OUR SUPPLY CHAINS

Our supply chains include proprietary branded manufacturers, original equipment manufacturers, and second tier distributors along with media agencies, online search engines and professional service firms. Suppliers are being assessed in terms of the nature of services they supply to the Connect Distribution Services Ltd and the geographical risk. Geographically, 80% of our existing purchases are made in the UK from long standing recognized UK suppliers and governed by the UK Modern Slavery Act 2015. Less than 20% of all our group purchases are made in Europe and Asia.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have a zero-tolerance approach to modern slavery and which reflects our commitment to act ethically and with integrity in all our business relationships and our commitment to implement and enforce effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery and Human Trafficking Policy.

Our Modern Slavery and Human Trafficking Policy demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## DUE DILIGENCE PROCESS FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains and ensure that our suppliers are selected through a robust supplier selection process.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- Ensure our terms and conditions on invitation to tender documents contain a clause on human rights issues
- Arrange training for all relevant staff

## TRAINING AND COMMUNICATION

We will share this statement with all employees through our internal communication channels and a copy of this statement is available on the CDSL website [www.cdsl.co.uk](http://www.cdsl.co.uk)

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to roll out relevant training to our supply chains teams to make them aware of the act.

## EMPLOYEES

CDSL operates a number of policies and procedures to ensure that we act in an ethical and transparent manner at all times. All of our HR policies guide employees on the expected standards of conduct and behaviour. Of particular note is our:

- Robust recruitment process that is fair and lawful that incorporates employment checks such as right to work.
- Whistleblowing policy through which employees can report any concerns about suspected slavery or trafficking.

## WHAT WE ACHIEVED IN 2019

- Rolled out training to the Supply Chain team
- Created a master spreadsheet of all suppliers measured against risk in the supply chain process
- Monitored all responses to MSA questionnaires from our suppliers
- Translated MSA questionnaires in international languages, including Mandarin, Italian and French

## FURTHER STEPS

Over the next 12 months we will continue to strengthen our approach to managing the risk of modern day slavery within our business and supply chains. We are also intending to carry out the following:

- Continue to educate and refresh training to all relevant employees to make them aware of the Act
- Continue to risk assess all of our suppliers in terms of the country and industry identifying any high risk suppliers.
- Continue to monitor the risk from completed standard supplier MSA questionnaires from our suppliers.

## BOARD APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, has been approved by the Board of Directors and will be updated annually in line with the act's reporting requirements.



**Andrew Sharp**  
Managing Director

3<sup>rd</sup> March 2020