



## Modern Slavery Act 2015

### Modern Slavery and Human Trafficking Statement 2019

#### Introduction

Kartell UK Limited recognises that modern slavery and human trafficking continues to be a blight upon global society. Modern slavery is a crime and a violation of essential and rudimentary human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of one person's liberty by another, in order to exploit them for personal or commercial gain. The aim of the company is to identify our responsibility by alerting staff to the risks, however small, in our business, and also in the wider supply chain. Staff are expected and encouraged to report any concerns they may have to management, who will act upon them.

Kartell UK Limited are consistently committed to improving our practices to combat slavery and human trafficking. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. This policy statement reflects our commitment to acting ethically in all our business relationships, and to ensuring slavery and human trafficking is not taking place anywhere in our supply chains.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2019.**

#### About Us

Kartell UK Limited was established in 2008 and developed with the support of major Turkish suppliers of heating and plumbing supplies. Kartell UK Ltd. has established a reputation as a premier supplier of high quality products to the UK Plumbing and Heating sector. Kartell currently has two branches across the UK: one in Bedford and one in Wigan. The organisation is controlled by a Managing Director, and two further Directors. Due to the demand for our products being consistently high throughout the year, the organisation is not deemed as seasonal. Kartell UK Ltd. imports heating and plumbing supplies from around the world in pursuance of its operation. Kartell UK's main suppliers are based in the United Kingdom, China, Turkey and Lithuania, but goods are also sourced from Poland and Italy.

#### Definitions

Kartell UK Limited considers that modern slavery encompasses (but is not limited to):

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse, or the threat of abuse;
- Being dehumanised, treated as a commodity, or being bought or sold as property;
- Being physically constrained or to have restriction placed upon freedom of movement.

## Commitment

Kartell UK Limited acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Kartell UK Limited understands that this requires an ongoing review of both its internal practices in relation to its labour force, and additionally, its supply chains.

Kartell UK Limited does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Kartell UK Limited in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Kartell UK Limited strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## Supply Chains

In order to fulfil its activities, Kartell UK Limited's main supply chains include those related to the supply of heating and plumbing supplies, from various suppliers across the world. Kartell UK's main suppliers are based in the United Kingdom, China, Turkey and Lithuania, but goods are also sourced from Poland and Italy.

## Potential Exposure

Kartell UK Limited considers its main exposure to the risk of slavery and human trafficking to exist in its product supply chains, as they involve the provision of labour in countries where protection against breaches of human rights may be limited.

In general, Kartell UK Limited considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## Steps

Kartell UK Limited carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

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

In accordance with Section 54(4) of the Modern Slavery Act 2015, Kartell UK Limited has taken the following steps to ensure that modern slavery is not taking place:

- Identifying and assessing the potential risks in its supply chains;
- Reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected to be involved in modern slavery;
- Conducting contractor appraisals which request modern slavery policies from contractors who provide services for the company.

### Training

The risks associated with modern slavery and human trafficking in our supply chains and our business are stressed to all employees at the induction stage, to ensure a high level of understanding by all employees. As those who come into closest contact with our supply chains, the members of our purchasing department are aware of the risks associated with modern slavery, and continue to identify, assess and monitor potential risk areas in our supply chains. Staff are expected and encouraged to report any concerns they may have to management, who will act upon them.

### Approval

This statement has been approved by the organisation's Director, who will review and update it annually.

**Kartell UK Limited**

February 2019