

CARVER

GROUP

Slavery and Human Traffic Statement 2019

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes Carver Groups' slavery and human trafficking statement for the year ended 31 December 2019. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit him/her for personal or commercial gain. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.

Our Structure

The Carver Group is a family owned business which manages a portfolio of manufacturing businesses; Biddle, Thermoscreens, Applied Comfort, Cooltherm, Carver Clamps and Widney Leisure. The Carver Group headquarters are in the UK and the company has representation in 50 countries and branches in Germany, France, the Netherlands, United Kingdom and Canada.

Our Supply Chain

The Company is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. Our product range and components are sourced from approved suppliers and is mainly manufactured in Europe, North America and Asia, especially China. The Company expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and it expects that its suppliers will hold their own suppliers to the same high standards.

The Carver Groups' Anti-Slavery & Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the supply chains.

Due Diligence

As part of Carver Groups' initiative to identify and mitigate risk it ensures that new suppliers must complete a Supplier Questionnaire prior to engagement in order to evaluate the risks of modern slavery and human trafficking.

We promote high standards and expect our employees and suppliers to comply with our company policies at all times.

Our employees are requested:

- To ensure they read, understand and comply with the policy
- To avoid any activity that might lead to, or suggest, a breach of this policy
- To promptly notify their line manager as soon as possible if he/she believes or suspects that a conflict with this policy has occurred, or may occur in the future
- To raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Carver Group has provided training to relevant members of staff. Carver Group uses the following means to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its businesses or supply chains:

- Business function reports
- Carver Group's suppliers are obliged to audit their own supply chains and report on the findings.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Carver Group's slavery and human trafficking statement for the financial year ending 2019.



Carole Keane
Group Marketing Director