

Keter UK Limited
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR
2021/2022

INTRODUCTION

This statement has been produced in compliance with the Modern Slavery Act 2015. It details the steps that have been taken to date by Keter to ensure that slavery and human trafficking are eliminated from its supply chain.

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

We are committed to acting ethically and with integrity and transparency in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place in either our own business or any of our supply chains.

OUR BUSINESS

Keter UK Limited is part of the Keter Group, a leading manufacturer and marketer of resin based household and consumer products, selling its products globally through a distribution network of over 25,000 retail outlets.

Currently, Keter Group employs approximately 4500 employees in sites across Europe, North America and Israel. Keter UK Limited has two main sites in the UK, employing approximately 250 staff.

In 2016 BC Partners acquired an 80% stake in the business.

OUR SUPPLY CHAINS

We seek to partner with suppliers who uphold our high standards of social, environmental and ethical conduct providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

OUR POLICIES AND CONTROLS

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner:

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. We recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates.

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. Employees have a confidential email address they can raise any concerns to.

Modern Slavery & Human Trafficking Policy: reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to identify, prevent or mitigate human rights' risks, slavery and human trafficking.

DUE DILIGENCE PROCESSES

As part of our procurement process, we aim to review and audit all current vendors in 2021/2022 financial year.

We now issue a Vendor Assessment questionnaire to all new vendors, which includes details of their Ethical Trading standards.

We expect all our Vendors to sign up to our Code of Conduct.

RISK MANAGEMENT AND ASSESSMENT OF EFFECTIVENESS

Keter UK is subject to annual Ethical Audits.

TRAINING

Training on this policy and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

Over the coming year we plan to focus on the following training:

- Undertake awareness presentations with key suppliers where appropriate.
- Roll out training to our procurement teams to make them aware of the Act and associated due diligence requirements.
- Conduct a risk assessment of our suppliers in terms of their country of origin and industry.

- Update legal contracts to include appropriate modern slavery prevention clauses for those existing suppliers and business partners for services and goods categorised as a potentially higher modern slavery risk.
- Maintain effective and continued focus on employee awareness of how we expect employees to conduct business responsibly, focusing on treating people fairly and equally, acting lawfully and the process involved to raise ethical concerns.
- Launch of code of conduct policy which explains the way we behave as an organisation and how we expect our employees and suppliers to act.
- Introduction of Whistleblowing portal and hotline hosted by a third-party supplier.

APPROVAL

The Board of Directors has overall responsibility for ensuring the policy complies with our legal and ethical obligations and that all staff comply with it.

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

*On behalf of the board of directors,
Lee Broomhall
Director*

Note. The Home Office guidance on producing the statement can be found at: <https://tinyurl.com/y9heccrx>. It includes links to other useful resources and bodies that offer advice on responsible business conduct.