



STAHlwille TOOLS LTD MODERN SLAVERY STATEMENT 2018

STAHlwille TOOLS Limited have produced this statement in accordance with the Modern Slavery Act 2015.

STAHlwille TOOLS Ltd are manufacturers & distributors of hand tools, power tools and other related products. Our customers are re-sellers, distributors and end-users. The products we supply to our customers are sourced from manufacturers and other suppliers in several different countries throughout the world.

We are aware that there may be some businesses around the world which have employees subjected to slavery or victims of human trafficking. Such practices are totally unacceptable to us both within our own business and also within the businesses of those with whom we deal.

STAHlwille TOOLS has a documented Ethical and Code of Standards Policy. A copy is set out later in this statement. The Policy makes clear our intolerance of slavery and human trafficking. In addition it includes our requirements in relation to other social, ethical and environmental matters. We take our Policy very seriously and take measures to ensure compliance with it, including:-

- We ensure that all our suppliers are aware of the Policy and that they are required to comply with it.
- Copies of the Policy are supplied to our senior and middle management and are also posted on the notice board in our business premises.
- All of our employees are instructed to read the Policy and are requested to raise any questions if there is anything they do not understand. They are also instructed that the principles and requirements contained in the Policy apply not only to our suppliers but also to our own business.
- We have a whistle-blowing policy in order to encourage our employees to report any evidence or suspicions of violations of any human rights such as (but not limited to) slavery or human trafficking.
- Any concerns raised to management will be noted and acted upon. Records will be kept.
- In addition, our suppliers and our employees are encouraged to call the Modern Slavery helpline (0800 0121 700) if they have any concerns.

This Statement and the attached Policy have been approved by the Board of STAHlwille TOOLS Limited.

P Elliott

MANAGING DIRECTOR

December 2017

Ethical and Code of Standards Policy of STAHLWILLE TOOLS Ltd

Objective

STAHLWILLE TOOLS is committed to ensuring that the suppliers in all countries from whom it buys goods treat their employees fairly and provide them with safe working conditions at all times, and that none of such employees is subject to slavery nor has been subject to human trafficking.

We are also keen to ensure that our suppliers are committed to minimising their impact on the global and local environment during the manufacturing process.

Standards

STAHLWILLE TOOLS Ltd will seek to ensure that our suppliers meet their social, ethical and environmental responsibilities in all respects. We also need to be satisfied that our suppliers have taken reasonable measures to ensure that those further down the supply chain also meet such responsibilities. Our particular requirements are:

1. **Slavery and Human Trafficking** – No employee shall be subject to slavery or have been the victim of human trafficking. Guidance issued by the U.K. Government explains what is meant by the terms “slavery” and “human trafficking” as follows:-
 - (a) “Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.”
 - (b) “An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.”
2. **Child Labour** – All suppliers must hold accurate records of the ages and working hours of all employees who in all cases must not be less than the legal minimum age as required under the relevant national Law.
3. **Hours of Work** – All suppliers must hold accurate records of the working hours of all employees and such hours must not exceed the legal maximum. All employees must receive a reasonably acceptable number of breaks, days off and holidays.
4. **Wages** – All wages must meet or exceed legal minimum levels and any deductions must be reasonable, agreed and understood by the employees.
5. **Employment** – There must be no discrimination in the hiring of employees, who should all be provided with a written contract of employment and disciplinary rules in a language they can understand.

6. **Abuse of Employees** – There must be no physical or verbal abuse of employees.

7. **Health and Safety and Hygiene** – All suppliers must employ a person who is empowered to deliver a safe working environment, where all risks of injury through exposure to fire or flood, materials, power, equipment, machinery or hazardous activities have been assessed and minimised. All working conditions should be clean, hygienic and meet all legal standards and all employees should have ready access to clean drinking water at all times.

8. **Environment** – It is important that all suppliers are committed to reducing the impact of the production of their products on the environment. Where they are producing goods which incorporate raw materials in short supply (e.g. wood) it is important that they meet all required standards of care and can produce all necessary certification, if appropriate.

Process

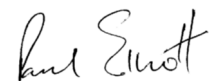
We or our agents will plan to carry out Ethical and Environmental audits of all major supply partners to ensure compliance with the necessary standards. STAHLWILLE TOOLS will always seek to work with suppliers, who are committed to meeting the standards as set out in this Policy.

It is important to STAHLWILLE TOOLS that all its suppliers make themselves aware of our Ethical and Code of Standards Policy and ensure that they and those further down the supply chain comply with it at all times.

We shall take appropriate action in the case of any supplier who fails to comply or co-operate fully. Such action will almost inevitably include our ceasing to trade with the supplier.

All enquiries or concerns relating to this Policy should be addressed to the Managing Director.

P Elliott



MANAGING DIRECTOR

December 2017
