

## Introduction and Policy Statement

The Modern Slavery Act 2015 (the 'Act') mandates that EW Group Ltd (EW) prepares a slavery and human trafficking statement each financial year.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights.

EW has a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

## Our Business

EW is an independent electrical wholesale company who supply electrical goods to electrical contractors and end users. Our head office is based in Avonmouth and we currently have two branches. The Company has an annual turnover of approximately £8 million.

## Responsibility for The Policy

The Director and senior management team of EW Group have overall responsibility for ensuring the policy complies with both our legal and ethical obligations with the prevention, detection and reporting of modern slavery in any part of our business or supply chain. It is the responsibility of all persons working for us or on our behalf in any capacity comply with this.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

## Our Supply Chains

Our supply chains include the sourcing of electrical products predominately from UK based suppliers. 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. Our Anti-slavery 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 ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Compliance

All persons working for us or on our behalf in any capacity must:

- *Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;*
- *Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and*
- *Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.*

As part of our initiative to identify and mitigate risk we:

- *Build long-standing relationships with local suppliers and make clear our expectations of business behaviour;*
- *Have a policy of "knowing our customer" to ensure that we are contracting with appropriate businesses;*
- *With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.*

We have in place systems to encourage the reporting of concerns and the protection of whistleblowers.

### Breaches Of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.


We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### Ongoing Review

This Policy Statement will be reviewed and published annually.

### Approval

This statement has been approved by the Managing Director who will review and update it annually.

Name: ANDREW SMITH  
Title: Managing Director  
Signature:   
Date: 23-2-18