

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

MiTek Industries Limited (“MiTek”) is committed to ensuring that its business and supply chain are free from slavery and servitude, human trafficking, forced or compulsory labour and child labour (collectively “human trafficking and slavery”). We strongly believe that we have a responsibility to promote ethical and lawful employment practices.

Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This statement defines our commitment to ensuring that human trafficking and slavery does not exist within our own business, but also provides detail of the efforts we are making to eradicate the same from other businesses with whom we maintain a relationship (and especially from within our supply chain).

MiTek has appointed its Human Resources Manager as its senior compliance officer (its Anti-Slavery and Human Trafficking Officer). The Anti-Slavery and Human Trafficking Officer will take appropriate steps to ensure not only our own compliance with this statement, but also that our values are adhered to by our suppliers, subcontractors and/or business partners worldwide.

### Definitions

**Slavery and Servitude:** Slavery 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.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her condition.

**Human Trafficking:** 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 can cover the arranging or facilitating of the movement of an individual with a view to exploiting them for sexual exploitation or non-sexual exploitation.

**Forced or Compulsory Labour:** Labour involving coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

**Child Labour:** Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour. The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of “work” can be called “child labour” depends on the child’s age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries.

Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery.

Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. In the UK, the Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.

### **MiTek's Structure**

MiTek specialises in the development of software solutions for structural timber engineering and the provision of steel connector products for its floor and roofing systems. Our Midlands manufacturing facility supplies customers throughout the UK and Ireland, as well as France and Germany. An additional three European production facilities supply the rest of our European customers in Scandinavia and Eastern Europe.

MiTek is owned by Berkshire Hathaway which has its head office in the US. MiTek has circa to 6700 employees and operates across Europe in 12 locations.

### **MiTek's Policies on slavery and human trafficking**

MiTek is committed to ensuring that there is no slavery or human trafficking in its supply chains or in any part of its business. MiTek's Anti-Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure that human trafficking is not taking place anywhere in its supply chains.

As part of our commitment to identifying and mitigating the risk of modern slavery and promoting ethical and lawful employment practices, we:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- Will ensure that the overall terms of employment are voluntary;
- Will comply with the minimum age requirements prescribed by applicable laws;
- Will compensate workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Will abide by applicable law concerning the maximum hours of daily labour;
- Will not engage in any practice of slavery, servitude, child labour, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and

- Will ensure that any sub-contractors or suppliers from whom we source goods and/or services for incorporation in those supplied to MiTek, also adhere to these requirements.

## **MiTek's Supply Chains**

The steel used in the manufacture of MiTek connector products is sourced from reputable sources including large global businesses as well as a selection of well-established smaller suppliers. The steel originates from mills in various countries, depending upon fluctuating availability and the continuing variations of the global steel market.

## **Due diligence processes for human slavery and trafficking**

MiTek has zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of the following:

- Suppliers must on request certify their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.
- Suppliers must be able to provide details of the steps they are taking within their own businesses and supply chains to ensure that they are free from slavery and human trafficking.

## **Supplier Adherence to our values**

MiTek performs periodic audits to ensure adherence to its values and suppliers are expected to fully co-operate with any such audit. Suppliers who are found to have engaged in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this statement will be liable to have any supply agreement, arrangement or other contract with MiTek terminated immediately.

## **Further Steps**

Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers and in relation to our own operations.

## **Reporting**

Any breach of this Policy (including by a Supplier) can be reported (in confidence, if required) by contacting MiTek's Human Resources Manager (in her capacity as MiTek's Anti- Slavery and Human Trafficking Officer).

## **Consequences**

MiTek takes any breach of this Policy extremely seriously.

It shall also take such other (remedial) steps as the Anti- Slavery and Human Trafficking Officer shall determine to be necessary to address the violation and seek to prevent its recurrence.



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 2020. It was approved by the Board on 31<sup>st</sup> December 2019.

**James Morgan**

**Managing Director, EMEA Residential**

**MiTek Industries Limited**

31<sup>st</sup> December 2019