

BEARDOW AND ADAMS GROUP SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021

Introduction

The Beardow Adams Group has a zero tolerance to slavery, servitude, forced labour and human trafficking. We are committed to conducting business with honesty and integrity and treating everyone with dignity and respect.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, prohibiting the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the Company financial year ending 31 December 2021.

Organisational Structure

The Beardow Adams Group was founded in 1977 and is a privately-owned business manufacturing adhesive in the UK, USA, Germany, Spain and Sweden and exports those products globally.

As a group we employ around 300 people, The Beardow Adams Group is committed to maintaining the Group's obligations under the Modern Slavery Act 2015.

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Primary and day-to-day responsibility for implementing this policy, including monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal control systems and procedures to ensure they are effective in countering modern slavery are managed jointly by the Head of HR and Compliance Manager.

Our Supply Chain

The Beardow Adams Group maintains a preferred supplier list that is both extensive and global. We source goods and services from both UK-based and international business partners to support the delivery of products.

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. We ask all suppliers about their own compliance as part of our supplier self-assessment. Their own statement can be located on their website and in most cases hard copies are sent to us.

Our Policies on Slavery and Human Trafficking

Considering the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have put in place a designated Modern Slavery and Human Trafficking Policy and conduct our business in an ethical and transparent manner

We have 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.

All of our employees are paid by bank transfer and we do not allow payment to be made to a third party bank account, thus reducing the risk of forced or compulsory labour.

We have a whistleblowing policy in place.

The Beardow Adams Group has an ethical trading policy in place and is a member of SEDEX, the Supplier Ethical Data Exchange.

We have a dedicated compliance team, led by the Compliance Manager, which consists of involvement from the following departments:

Legal; Audit and Compliance; Human Resources; Procurement and Sales.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide awareness to our staff. Our business partners also provide the same levels of awareness to their staff, suppliers and providers.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We continue to strengthen our supply chain by continually sending out questionnaires to new and existing suppliers to check their compliance.
- We review our ethical trading programme annually to ensure it reflects best practice.

Further Steps

In 2019, we invested in the Sedex Members Ethical Audit (SMETA) to conduct high quality audits which encompasses all aspects of responsible business practice. In 2020 we invested in EcoVadis which allows us to evaluate our, and our supply chain's Corporate Social Responsibility.

We will continue review any measures needed to continue to combat slavery and human trafficking during 2021.

This statement has been reviewed and approved by the Board of Directors and will be reviewed annually.



Adrian Day
CEO
Beardow Adams Group