

# Modern Slavery - Statement



## Background

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude.

These criminal activities deprive people of liberty in order to exploit them for personal or commercial gain.

## Overarching Commitment.

Stiltz Ltd have a zero tolerance towards modern slavery and human trafficking and are committed to fulfilling our social and corporate responsibilities. We are committed to acting with integrity and ethically in all our business dealings.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels, directors, consultants, contractors, agency workers, volunteers, trainees, business partners and our supply chain.

We are committed in our approach to tackling modern slavery throughout our supply chains.

## Business Organisation, Structure and Supply Chain.

Stiltz Limited operates globally, with a manufacturing facility in Kun Shan, China, and directly employ a large number of people internationally and maintain relationships with many different organisations and suppliers.

## Policies and Due Diligence.

Stiltz Ltd is committed to ensuring that it does not contribute to any adverse human rights impacts, both internally and throughout its supply chains. We are committed to engaging with suppliers who share our principles and, where necessary, implementing corrective measures. In the event that suppliers fail to address or prevent adverse human rights impacts, Stiltz will reassess its business relationships with them.

During our supplier onboarding process, major suppliers will be required to sign and return a document confirming any actions they take to manage modern slavery and human trafficking risks within their business and their supply chain.

## **Responsibility**

1. Our senior management team have been briefed on this subject and take responsibility for implementing this policy. The CEO has authorised this statement and represents the board.
2. Our line managers at all levels are responsible for ensuring that all those who report to them understand and comply with this policy.
3. Staff at all levels are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the QUENSH Management Representative who will in turn involve the senior management team as required.

## **Potential Exposure**

Stiltz as an Organisation considers its main exposure to the risk of modern slavery and human trafficking to exist within the activities of the suppliers and their suppliers of the raw materials. This is because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, Stiltz considers its exposure to modern slavery/human trafficking to be extremely low, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and services to it.

## **Compliance and drive**

1. All staff must read, understand and comply with this policy.
2. All staff must avoid any breaches of this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.
3. All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.
4. Staff are reminded that there are systems in place e.g. "Positive Intervention" to encourage the reporting of concerns and to protect whistle blowers.

## **Breaches of Policy**

1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
2. We will terminate relationships with suppliers, individuals or business partners working on our behalf if this policy is breached and not remedied immediately.

## Effectiveness.

- During 2023/24 Stiltz Ltd identified no instances of modern slavery in the supply chain

## Plans for 2024

- We will issue updated versions of our Anti-bribery and Corruption policies, and our Whistleblowing policy to support the management of our modern slavery commitments.
- We aim to develop staff training particularly focusing on anti-bribery and corruption.
- We will continue to monitor working practices Chinese manufacturing plant yearly and commit to an open dialogue with our Chinese employees on working practices.
- We will continue to develop awareness of modern slavery through ongoing staff training.

This statement has been approved by our Board of Directors, who will review and update it as necessary and at least on an annual basis.



**Mike Lord**  
Chief Executive Officer

.....8<sup>th</sup> August 2024.....

**Date**