



Modern Slavery Policy

Introduction

This statement sets out the actions that The CDA Group Ltd (“CDA”) is taking to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities proposed during the financial years 1st January 2018 to 31st December 2019.

CDA recognises that it has a responsibility to take a robust approach to slavery and human trafficking and confirms it is committed to preventing such activity taking place within its corporate activities and supply chains.

Organisational structure and supply chains

CDA is a trade supplier of kitchen appliances and is a wholly owned subsidiary of Amica SA, a company registered in Poland and quoted on the Warsaw stock exchange.

CDA sell a number of brands either owned by themselves or sold under license provided by its parent company. (For clarity, the other brands within the CDA portfolio are Matrix and Amica). The appliances are manufactured in a number of factories in Europe and Asia and are imported to the UK by CDA.

CDA is predominantly focused on the domestic UK market with a very small export business to a few overseas markets. The following process is currently being developed and will be used by the company to assess whether or not particular activities are high risk in relation to slavery or human trafficking:

- risk based approach to ensure supplier assessment & compliance
- prospective suppliers visited by representatives of senior management before trading commences in order to make an assessment of risk
- Amica SA supplier code of conduct to be signed by all suppliers
 - regular supplier audits undertaken to re-assess risks of specific suppliers
 - concerns are to be subjected to further investigation and if considered necessary, a full audit is to be carried out, to which the supplier will have access

High-risk activities

- CDA does not consider that any of its activities are high risk in terms of the possible existence of modern slavery or human trafficking. Low and medium risks are to be identified and managed through the process described above

Responsibility

Responsibility for the organisation's anti-slavery initiatives sit with the Managing Director as delegated through key senior managers.

- **Policies:** Policies relating to modern slavery are the responsibility of the Managing Director who delegates through the Supply Chain and Product Development Teams for external suppliers and the HR Manager for staff and agency workers. All such policies are to be reviewed and updated as and when required



Modern Slavery Policy

- **Risk assessments:** Risk assessments are to be formally incorporated into the organisation's supplier assessment audits which are completed regularly (usually, one per year). Target completion date 1st August 2019
- **Training:** A training programme is being developed with a targeted completion date of 1st August 2019

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise matters confidentially
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation is working with suppliers to ensure that they meet the standards of the code and provide reasonable working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. CDA always interviews all prospective employees and any concerns emerging during that process regarding modern slavery risks are thoroughly investigated

Activity

The organisation is reviewing its activities in light of the introduction of the Modern Slavery Act 2015 and as a result, the organisation is:

- requiring all senior staff working in Supply chain, Product development, Quality and HR to have completed training on modern slavery by 1st August 2019
- developing a system for supply chain verification expected to be in place by 1st August 2019 whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, which is expected to be completed by 1st December 2019, whereby the organisation evaluates all existing suppliers

Training

The organisation requires that by 1st August 2019 all staff working in senior supply chain, product development, quality and HR within the organisation to complete training on modern slavery.



Modern Slavery Policy

The organisation's modern slavery training will cover the following:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- how to identify the signs of slavery and human trafficking
- what initial steps should be taken if slavery or human trafficking is suspected
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation
- what external help is available, for example through the Modern Slavery Helpline, Gang-masters and Labour Abuse Authority and "Stronger together" initiative
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains

Awareness-raising programme

As well as training staff, the organisation will raise awareness of modern slavery issues by communicating to staff using a range of tools including blogs, emails, posters and presentations. At least once per year it will be included in the staff quarterly communications meetings chaired by the Managing Director which include all CDA employees

The awareness materials will explain to staff:

- the basic principles of the Modern Slavery Act 2015
- how employers can identify and prevent slavery and human trafficking
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation and
- what external help is available, for example through the Modern Slavery Helpline

Board approval

This statement has been approved by the organisation's Board of Directors who will review and update it annually.

Simon Emmons, Managing Director, The CDA Group Limited
Date: 29th January 2019
(Financial Year End 31st December 2018)