

THE STELRAD RADIATOR GROUP

Statement July 2017

Modern Slavery Act 2015 (“the Regulations”)

The Stelrad Radiator Group, headquartered in the UK, manufactures in the UK, Belgium, the Netherlands and Turkey and supplies radiators to customers in those markets and many other markets across the globe.

Although the Regulations are UK based we believe that as a socially responsible international business we have a duty to apply the principles contained within the Regulations across the entire Group.

We therefore acknowledge our responsibility in connection with the Regulations to buy and sell in an ethical manner and we will work closely and transparently with our suppliers and customers to achieve this.

This statement is made pursuant to Section 54, Part 6 of the Regulations and sets out the steps the Company has taken to ensure that slavery and human trafficking is not taking place in our inbound supply chains or in any part of our business.

Inbound Supply Chain Overview

Respecting human rights and environmental issues in our inbound supply chain is ultimately our suppliers’ responsibility. As customers, however, we play an active role in supplier development and have adopted means to clearly communicate our expectations to our suppliers.

Only suppliers who share our standards and values will be considered appropriate to trade with our Group. We seek to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings at all times.

In our standard procurement due diligence process, we audit our suppliers and will only work with organisations who formally commit to our Ethical Trading Policy.

Stelrad will not work with any organisation that either has or is found to be knowingly involved with either human trafficking or modern slavery.

Internally, our Corporate Social Responsibility policy sets out our vision our standards and our aims. It addresses Health Safety and Environmental matters, our role in the community, commitments to our employees and our commitments to customers and to ethical trading. We encourage businesses throughout our supply chain to adopt and enforce similar policies in their own operations.

Effectiveness and Communication

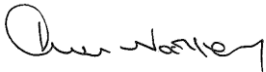
As part of the above policy, we will:

- Communicate the policy to our entire workforce
- Provide training to relevant members of staff

- Complete regular audits of our supply chain
- Ensure that our company directors champion its understanding and implementation within the business

Approval

This statement has been approved by the company's board of directors.



Kevin Woolley,
Group HR Director
July 2017