



MODERN SLAVERY STATEMENT

Introduction

The Modern Slavery Act 2015 came into effect on 29th October 2015. This law requires manufacturers and retailers doing business in the UK which supply goods or services and have an annual turnover exceeding £36 million to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

Modern Slavery can occur in various forms including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

This statement sets out John Guest Limited actions 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.

The Company is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. The Company is making every effort to prevent slavery and human trafficking in its corporate activities and to ensuring that its supply chains are also free from slavery and human trafficking. The Company is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

John Guest Limited manufactures a large proportion of their own products and manage most of our own distribution. We view our overall risk to slavery and human trafficking to be low.

Company Structure

This statement covers the activities of John Guest Limited:

- John Guest Limited design, manufacture, source and distribute fittings, pipe, valves and other plumbing components in various plastics and metals for applications in fluid power, water and fluid transmission, plumbing, pneumatics, drinks dispense, fibre optics, and telecommunications.



- The majority of our products are manufactured in the United Kingdom and raw material products are sourced from reputable suppliers.

Countries of operation and supply

- John Guest is headquartered in the UK . The company currently operates 6 fully owned sales subsidiaries (France, Spain, Italy, Germany, Czech Republic, Poland).

Supply Chains

We recognise that modern slavery is a complex supply chain issue and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. All our business critical suppliers have been evaluated and we continue to review our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking from taking place in our supply chains.

It's an essential requirement of our suppliers to take positive steps to ensure slavery and human trafficking is not present in their supply chains.

The Company has the right at any time to audit suppliers for compliance.

Responsibility

Responsibility for the Company's anti-slavery initiatives are as follows:

- **Policies:** The EMEA CEO and Director of Human Resources are responsible for drafting and reviewing the Company's Policies. The policies are developed in line with legislative requirements and take into account best practice.
- **Investigations/due diligence:** In the UK the Board of Directors will be responsible for deciding who will conduct investigations or due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business activities, we have carried out tailored training by a third party company "Maplecroft" for employees within Human Resources, Procurement and Quality as required.



Relevant policies

The Company 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:

- **Corporate Social Responsibility Policy** This policy was developed in line with the group's ongoing commitment and determination to conduct all its affairs ethically, honestly and with integrity. It applies to all our employees along with relationships with customers and suppliers. This is currently being reviewed to incorporate anti-slavery initiatives.
- **Anti-Corruption Policy:** The Company's policy clearly states that the company is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the Company's behalf is responsible for conducting business honestly and professionally.
- **Whistleblowing Policy:** The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Currently under revision to include concerns about suspected modern slavery associated with the Company or our suppliers. Employees who have concerns can contact the HR Department in confidence via telephone no: 01895 425325 or via email to Personnel@rwc.com with the subject heading 'Confidential Disclosure'.
- **Employee code of conduct:** The Company's policies and Employee Handbook makes it clear to employees the actions and behaviour expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct:** The Company 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. We prohibit the use of child labour, physical punishment, forced or compulsory labour as well as any other forms of human abuse. Serious violations of the Company's supplier code of conduct will lead to the termination of the business relationship. We will not knowingly do business with the any individual or company that abuses the rights of others.
- **Recruitment/Agency workers policy:** The Company uses only specified, reputable employment agencies to source labour.



Due diligence

The Company has a formal procurement policy that includes reviews of regular suppliers integrity and compliance in respecting the human rights of others. The Company has taken a risk based approach in considering our exposure to modern slavery. Our focus over last financial year has been to review suppliers of value adding materials, which may be of potential risk. Vendor appraisal questionnaires have been sent to all materials, contracting and equipment suppliers and will be on a regular basis. The Company is currently assessing to what extent we may require independent audits of our suppliers. No decision has been made whether to verify future assessments or require unannounced third party audits of suppliers.

A system for supply chain verification was also undertaken, which involved the Company evaluating our suppliers, We engaged the services of an independent detailed geographical risk assessment. Suppliers are now being assessed on a routine and regular basis.

Proposed actions

In light of the introduction of the Modern Slavery Act 2015 the Company is:

- In June 2018 the John Guest group was acquired by the Reliance Worldwide Corporation shortly followed by the introduction of many products sourced from countries deemed to be of high risk and therefore special emphasis will now be focused on assessing those suppliers
- continuing to review its existing supply chains and work alongside suppliers to eliminate risk from our supply chain; and
- To assist suppliers in understanding their obligations
- Further to the Geographical risk assessment we will continue to investigate the JG suppliers deemed to be in the high / Medium risk group.
- We will continue to develop our approach to tackling the issue of Modern Slavery. It is already apparent that our processes will evolve and may require a different approach as more information becomes available.



Training

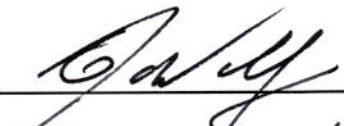
The Company's modern slavery training covers:

- 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 Company;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing 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 Company should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chains.

John Guest complies with the employment laws of every country in which we operate in and expect those that we do business with to do the same.

This statement has been approved by the Companies Board of Directors in relation to the financial period ending 30th June 2019.

Director's signature:


E. G. A. de Waard

Director's name:

Date:

18-12-2018