

Modern Slavery Statement for the Financial Year ending 31 December 2022

This statement is made pursuant to section 54 (Transparency in Supply Chains) of the UK Modern Slavery Act 2015 and sets out the steps that Becker Industrial Coatings Limited ["Beckers"] have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Beckers has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

The core activity of Beckers is the development, manufacture and supply of paint to the industrial coatings market in the UK, where we have one single manufacturing site and work with 500 suppliers covering production and non-production spend.

Our Internal Policies

We operate internal policies to ensure that we are conducting business in an ethical and transparent manner with the wellbeing of our people at the forefront of our actions.

These policies include:

1. **Beckers Group Code of Conduct:** Our over-arching Code of Conduct sets out our standards for how we behave as an organisation and how we expect our employees to act. This includes a commitment to live by Beckers values and deliver on our purpose. Our code of conduct is based upon universal principles and stresses that we embrace, support and act in the areas of human rights, labour standards, the environment and anti-corruption as expressed in the ten principles of the United Nations Global Compact, the Universal Declaration of Human Rights, the Guiding Principles on Business and Human Rights as well as the Children's Rights and Business Principles. This code of conduct is supported by all Beckers employees and is supplemented by regular training.
2. **Whistleblowing policy:** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Concerns can be reported through the Beckers Group website or by contacting our legal counsel or a designated third-party lawyer. Any matters raised are treated with the utmost seriousness and are investigated thoroughly.
3. **Recruitment policy:** We operate a robust recruitment policy for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our External Policies – Supply Chain

We commit resources to periodically evaluate our business and supply chain. Our model is to monitor, detect, and prevent instances of human trafficking and slavery in our business and supply chain.

We conduct due diligence on suppliers before allowing them to become a preferred supplier, which includes our own information gathering, data gathering from VANTAGE screening and online searches to exclude suppliers who have been convicted of offences relating to modern slavery. In 2022, Beckers also received its first gold rating for Corporate Social Responsibility performance by ECOVADIS.

In addition, we are currently working to introduce a robust Supplier Assessment Questionnaire which will include, amongst others, the following areas: Labour Standards; Health and Safety; The Environment, and; Business Ethics. This, combined with inherent risk and social audits will be used as part of a wider assessment tool which will allow us to highlight potential risks.

It is our intention that, once this due diligence is complete, a risk score will be assigned to each supplier based on the results. In the future, we will be working to implement a system of site visits to suppliers with a higher risk score which, once implemented, will allow us to make assessments about compliance first hand. The combination of the above tools will allow us to identify and investigate risks fully and to exclude suppliers who do not comply with our policies (and to report unlawful practices to the authorities, where appropriate).

Supplier Code of Conduct

Beckers terms and conditions not only bind suppliers to comply with all applicable laws and regulations relating to anti-corruption and best practices in health & safety, working conditions and the environment but also ensure that suppliers agree to accept our Supplier Code of Conduct. This applies to every supplier we engage with and we expect each of them to sign up to this code in order to work with us – and to continue to work with us.

It is our intention to expand the scope of our code of conduct to cover customers in the future.

Training

Beckers provides regular training for our procurement/buying teams to enable them to identify risk factors for modern slavery in our supply chain and to make assessments about whether suppliers compliant with our policy and the law.

This statement was approved by the UK Board of Directors on **30 September 2023**.

Stephen Crabb
Managing Director