



**KEW (ELECTRICAL DISTRIBUTORS) LIMITED**  
(the "Company")

**Slavery and Human Trafficking Statement**

**INTRODUCTION FROM THE MANAGING DIRECTOR**

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Our employees are alert to the risks and are expected to report their concerns, and management are expected to act upon them.

**ORGANISATION'S STRUCTURE**

KEW (Electrical Distributors) Limited, trading as Kew Electrical, is an independent electrical wholesale company. The head office is based near Brighton, East Sussex and we have 26 branches throughout the South of England plus one branch in Belfast, Northern Ireland.

The Company has an annual turnover of approximately £90 million.

**OUR BUSINESS**

The principal activity of our business is the wholesale of electrical goods to electrical contractors and users.

**OUR SUPPLY CHAINS**

Our supply chains include the sourcing of electrical products predominately from UK based suppliers.

**OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place any where in our supply chains.

**DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we:

- Build long-standing relationships with local suppliers and make clear our expectations of business behaviour;

- Have a policy of “knowing our customer” to ensure that we are contracting with appropriate businesses;
- With regards to national or international supply chains, our point contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt ‘one-up’ due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide briefings to our Directors and employees.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of audits by Branch Managers, Directors and the Human Resource Manager;
- Use of staff monitoring and payroll systems; and
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

  
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**G R Kerly, Managing Director**

**Reviewed and updated: 1<sup>st</sup> June 2019**