Modern Slavery Statement

This statement sets out Otter Controls Limited's 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. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Our business

Otter Controls Limited is an engineering and manufacturing company with specialisations in kettle controls, small domestic appliance connections, bimetallic safety cut-outs and motor protectors. It offers a range of standard products, in addition to offering our engineering and manufacturing expertise and facilities for bespoke projects. As the parent company of a larger group, it can offer an even wider range of products, expertise and manufacturing services through our subsidiaries.

Otter Controls Limited is committed to best corporate practices and ethical values and has a zero-tolerance approach to any form of modern slavery. The Company is 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.

Potential risk areas

The parts of our operations where we consider there is a potential risk of modern slavery are our supply chain and employee recruitment.

Suppliers

The Company sources raw materials, components and equipment from both UK and international suppliers. The supply chain involved in the manufacture of our products is complex, often involving multiple levels between Otter Controls Limited and the source of raw materials that enter the manufacturing process. Whilst this makes it a challenge to effectively manage the risks of modern slavery throughout the entire

supply chain, the approach taken is to actively manage and utilise our direct suppliers as the means of clearly communicating our expectations down through the supply chain.

As we have a zero tolerance to modern slavery and human trafficking, we expect all those in our supply chain to comply with our value. However, these supplies, or elements of them, may originate from overseas locations that have been identified by the Group as carrying a higher potential risk of modern slavery.

Employees
The Company employs around 230 employees. There is no risk that employees may not have the right to work in the UK or that they are paid less than the minimum statutory pay provisions.

Policies and procedures

In order to mitigate the risk of modern slavery within the risk areas identified the Company plans to and already operates a number of policies and practices covering suppliers and recruitment.

- Whistleblowing Policy
  The Company encourages all of its employees and suppliers and other business partners to report any concerns related to activities within the business or its supply chain. This includes any circumstances which might give rise to an increased risk of modern slavery or human trafficking. The whistleblowing procedure is designed to make it easy for all categories of stake holders to make disclosures without fear of retaliation.

- Supplier Quality Audit Questionnaire
  The Company already utilises a system with an audit questionnaire which is issued to all suppliers and includes questions on the supplier's management of the risks of modern slavery.

- Supplier Code of Conduct
  The Company intends to work towards introducing a Supplier Code of Conduct which will set out and communicate the social standards and

business ethics that we expect from our suppliers. We are committed to ensuring that our suppliers adhere to the highest ethical standards. Suppliers will be required to demonstrate that they provide their workers with safe working conditions, treat them with dignity and respect and act ethically and within the law. In addition they will need to demonstrate that they are implementing and enforcing effective systems and controls to ensure modern slavery or human trafficking is not taking place.

Due Diligence

In general, the Company considers its exposure to modern slavery and human trafficking to be relatively limited and we have not, to our knowledge, conducted business with another organisation which has been found to have involved itself with modern slavery. In order to mitigate the risk of modern slavery within the risk areas identified the Company aspires, wherever possible, to build long-standing relationships with suppliers and make clear our expectations of business behaviour. We approach this as an ongoing responsibility to increase supply chain transparency.

Approval of this statement

The Board of Otter Controls Limited remains dedicated to strengthening its practices to continuously reduce its exposure to modern slavery and human trafficking risks.

This statement has been approved by the Board of Directors and executed by the Chairman & Chief Executive on their behalf



Dr David Smith - Chairman & Chief Executive

January 2024