Modern Slavery Act Statement

For the financial year ended 30 April 2023

Overview

In line with the requirements of the Modern Slavery Act 2015, this statement sets out the steps that Jack Sealey Limited are taking to ensure that no aspects of modern slavery or human trafficking are operating within either its own business or any part of its supply chain. The processes that have been put in place are also intended to provide complete transparency across all the business operations.

About Sealey

Jack Sealey Limited is an importer and distributor of a diverse range of product to sectors such as Automotive, Agricultural, Construction, Engineering, Garden, Industrial, Marine, and Motorcycle sectors. The business trades under the leading brands of Sealey, Siegen, and Worksafe. In addition to the main UK sales base, the company distributes to more than 70 other countries, and offers more than 12,000 main product lines through UK dealers and export distributors.

Suppliers

The company sources products from factories in various countries around the world. In all its dealings with these suppliers Jack Sealey Limited strives to ensure that the highest ethical standards are reached. As part of this ongoing obligation, there is a requirement on these suppliers for a long-term commitment to eradicate any slavery and human trafficking in their businesses and in their own supply chain.

Due Diligence

To ensure the highest ethical standards are upheld in every part of the supply chain, Jack Sealey Limited regularly monitors the activities of its trading partners. This is achieved by the establishment of strong working relationships between overseas suppliers and the company's UK based staff, which includes visits to supplier premises in their home countries. In addition to this, the company has several staff members permanently based overseas who are able to monitor and review suppliers. Periodic audits of supplier documentation are standard practice during buying visits by UK based staff, and by those based at the company's overseas representative offices. As part of this commitment Sealey are members of Sedex which is a platform to monitor and report on supplier standards.

Risk Assessment

An ongoing review of the company's direct suppliers in the UK has resulted in no immediate concerns, and so this poses minimal risk in terms of non-compliance with the requirements of the Modern Slavery Act. With regards to those suppliers based abroad, Jack Sealey Limited utilises the due diligence process outlined above in order to mitigate possible risk of non-compliance. Additional audits and reviews will be carried out on suppliers should this

prove to be required. As part of such investigation the company will request written undertakings from those suppliers in order to satisfy itself of their ongoing ability to comply with the Modern slavery Act.

Staff Training
The training programme for all staff who deal with the company's suppliers includes compliance with the Modern Slavery Act, and how that compliance can be monitored in order to mitigate risks within the supply chain. The Code of Conduct for staff is reviewed on a regular basis to ensure its relevance and compliance with the Modern Slavery Act. As part of any discussions and negotiations with current and potential suppliers, company staff are trained to ask relevant questions of each supplier in relation to what steps are being taken by them to ensure compliance by the supplier and by their own supply chain.

Employment
The company requires that all partners in the supply chain operate a fair recruitment process which attempts to ensure that staff are not being forced to work against their own free will.

Ongoing Commitment
The company directors will continue to upgrade the above due diligence policy on an ongoing basis. All necessary resources will be made available, including training and upskilling of relevant staff, in order to ensure that the ethical position of the company is maintained to the current high standards, and beyond.

Annual review
This policy will be reviewed and updated by the board of directors on an annual basis.



Signed By: Ben Sealey
Position: Group CEO

Date: 9th October 2023