

COMMENT FROM OUR MANAGING DIRECTOR

We, at Zehnder Group UK, are committed to identifying and eradicating all forms of Modern Slavery and Human trafficking within our own business and our supply chains. We have taken steps to raise awareness internally in our own business and externally in our supply chains. We demand that our suppliers do not engage in this practise and that they also take steps to manage their supply chains with the same ethical principles we believe and promote.

ORGANISATION'S STRUCTURE

We are a manufacturer in the Heating, Cooling and Ventilation sector. Zehnder Group UK Ltd is part of the parent company Zehnder. The UK group employs approx. 160 people with a turnover of £50m. Zehnder has its head office in Switzerland The Group has over 3,000 employees worldwide and operate in 15 countries.

The Group has a global annual turnover of Euros 600m.

OUR BUSINESS

Our UK business is organised into 2 business units: Zehnder Group UK Ltd- which covers our sales team for Heating Cooling and Ventilation products, and Zehnder Group Lenham Ltd, which covers production and warehousing for our Ventilation products

OUR SUPPLY CHAINS

We have a global network of supply chains and use both 3rd party vendors and our own internal manufacturing plants. We purchase raw materials, finished goods, commodity products and services to support our heating and ventilation business.

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 anywhere in our supply chains.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. We also expect all those in our supply chain, including the vendors to our vendors, to comply with our values and ethics. During 2019 we will enhance our ethical approach and only work with vendors whom:

- 1) Have, or are developing, an Ethical policy focussed on:
 - Zero tolerance of Modern Slavery & Human trafficking in their organisation and supply chains
 - Take responsibility for identifying and eradicating of any forced, bonded, involuntary & child labour in their. organisation and supply chains
- 2) Have had, or are open to, Ethical audits by either trained Zehnder personnel or accredited 3rd party auditors.

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 training for all colleagues involved in supply chain activities. We request our business partners to provide training to their staff and suppliers.

Reporting

Zehnder already has mechanisms in place for individuals to raise concerns, through their line manager initially. However should you be concerned about potential slavery issues please contact either your line manager in the first instance or the HR Manager.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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

- Database of completed self assessment Ethical audits of approved vendors
- Database of completed physical Ethical audits of vendors considered to be high risk.

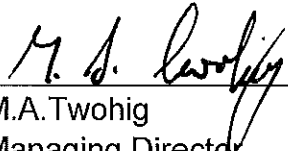
FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Enhance our vendor self-assessment template to include Ethical commitment of vendor.
- Raise awareness through relevant staff training.

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 financial year ending December 2018

This statement has been given management team approval on 17/04/2019.

Signed  _____
M.A. Twohig
Managing Director

Date _____
17 April 2019