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## Rema Tip Top Holdings UK Limited Modern Slavery Transparency Statement

Rema Tip Top Holdings UK Limited ("Rema Tip Top") is committed to ensuring that there is no slavery or human trafficking in any part of its own business or supply chains. This statement sets out our current risk analysis and the steps that we have taken and those we plan to take to deliver on this commitment.

### Organisational Structure

We are a company incorporated in England and Wales with company number 06750854 and are part of a group. Rema Tip Top is a market leader specialising in Automotive, Material Processing and Surface Protection product sectors. As a company and a brand, we stand for top quality and outstanding service. Augmented by state-of-the-art technology and pioneering innovations, REMA TIP TOP is complimented by a team of experts to ensure that the business constantly maintains its position at the forefront of industry. Our supply chain is described further below.

### Risk Analysis

On the basis of our current knowledge, we consider the risk of modern slavery and human trafficking within our own business and our supply chains to be low.

We use a wide range of suppliers in support of our business. These include third party suppliers, some of which are based outside of the UK. Risk assessment is performed on all suppliers before commencing trade to verify suppliers conform to our policies and procedures.

As part of the company's due diligence processes into slavery, the supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources outside the UK and EU are potentially more at risk of slavery. The level of management control required for these sources will be continually monitored.

### Our Policies and Procedures

We operate a zero tolerance approach to slavery and human trafficking within our business and our supply chains. We strive to demonstrate transparency and integrity across our business and expect both our employees and our suppliers to respect and comply with our values.

We have the following policies in place in the UK, aiming to ensure that we conduct our business in an ethical and transparent manner and to minimise the risk of modern slavery in our supply chains:

- Anti-Bribery and Corruption Policy – this sets strict limits for the giving or receiving of gifts or hospitality.
- Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Group Procurement Guidelines – this is published by our German parent company Rema Tip Top AG and provides strict guidelines to follow in sourcing and procuring products.



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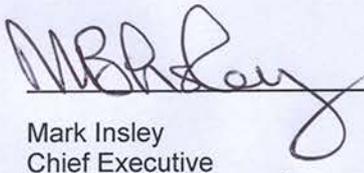
### Further Steps

- In the next financial year, we will be looking to:
  - (a) Develop and implement a Whistle blowing Policy – this encourages our UK employees to report any concerns relating to our direct activities or our supply chains including specific reference to modern slavery, human trafficking or child or adult enforced.
  - (b) Reviewing our current suppliers and partners with the intention of focusing on their practices and policies relating to modern slavery and human trafficking to ensure their compliance with the Modern Slavery Act;
  - (c) Requiring all new suppliers and partners to complete a modern slavery questionnaire and we will carry out further due diligence where we consider that there may be a potential modern slavery and/or trafficked labour risk;
  - (d) Including appropriate contractual provisions within our terms and conditions of purchase to ensure that our suppliers are contractually committed to seeking to avoid the use of slave labour and trafficked labour;
  - (f) For our teams or managers who may be responsible for managing contracts and relationships with suppliers or partners, we are planning to provide training to seek to ensure that there is an appropriate appreciation of the risks associated with modern slavery and trafficking. We are also intending that such training includes examples of potential ways to recognise the warning signs modern slavery and trafficked labour along with an understanding of the procedure to be followed in the event of any suspicious activity taking place within our supply chains.

### Approval

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes our modern slavery and human trafficking statement for the financial year from 1<sup>st</sup> January 2019 to 31<sup>st</sup> December 2019.

Approved by:

  
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Mark Insley  
Chief Executive

Date: 12/11/2018

Group Companies covered under this statement are;  
Rema Tip Top Holdings UK limited  
Rema Tip Top Automotive UK Limited  
Rema Tip Top Industry UK Limited  
Harvie Tyres Limited  
Van-Line Limited  
Clampco (UK) Limited  
Quest Consumables Limited  
FST Consumables Limited