

Modern Slavery Statement

15/11/2021

Version 1.0

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MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2021

INTRODUCTION

This statement is made on behalf of Apogee Corporation Limited pursuant to section 54(1) of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement. This is Apogee Corporation Limited's first statement issued under the Modern Slavery Act 2015 and builds upon our Modern Slavery Policy. It outlines the steps we have taken as a business to identify and prevent slavery and human trafficking in our own operations and supply chains. We understand our responsibilities and are committed to improving our practices to combat slavery and human trafficking.

OUR BUSINESS AND SUPPLY CHAINS

Apogee Corporation Limited is Europe's largest multi-brand provider of managed print services, document and process technology and outsource services, supplying equipment and services to customers in the UK, Republic of Ireland, Jersey and Germany. The company has its head office in Maidstone in the UK, with operational offices across the UK, Republic of Ireland, Jersey and Germany.

Apogee Corporation Limited sources its products and services mainly from UK suppliers, and occasionally from other countries in Europe.

Our supply chain includes the sourcing of print and IT hardware, software solutions, consumables and service related items that are principally related to print and IT technologies and the maintenance of the same.

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 Modern 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 business and in our supply

chains. Accompanying this is our Whistleblowing Policy which provides a system for our employees to escalate slavery and human trafficking issues and breaches of our Group policies. Both policies are reviewed annually. There have been no breaches or suspected breaches of our Modern Slavery Policy reported in 2021.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify, monitor and mitigate against industry risk, business transaction risk, and risk in the countries in which we operate, we have centralised our procurement function to improve visibility of supply chain compliance. We have also appointed a Supply Chain, Logistics & Procurement Director to drive compliance in our supply chains. The Supply Chain, Logistics & Procurement Director is assisted by the Head of Legal and Head of Sustainability and Business Assurance to identify any risk of Modern Slavery and Human Trafficking in our supply chains. Regular reporting on supply chain compliance is done throughout the business and reviewed by the Executive Leadership Team.

We also have in place policies and systems across our business; and our supply chains to:

- Identify inappropriate employment practices;
- Identify, assess and monitor other potential risk areas;
- Mitigate the risk of slavery and human trafficking occurring;
- Protect whistle-blowers; and
- Investigate reports of Modern Slavery.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant country of operations. We have also developed a Supplier Code of Conduct which outlines our expectations. The Supplier Code of Conduct lists Apogee Corporation Limited's Mandatory Policies and we expect Suppliers to adhere to these standards or higher. The relevant procurement managers will monitor and enforce compliance of the Supplier Code of Conduct.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant in-house awareness training to our employees. Under our Supplier Code of Conduct we will be requiring all business partners to provide regular and relevant training to their employees, suppliers and providers.


NEXT STEPS

- Raise awareness of the Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct with our employees and suppliers through our new Supplier Onboarding Platform.
- Additional training for all procurement managers as necessary.
- Integrate any learnings into our future strategy.

STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending 30th October 2021 and was approved by the Executive Leadership Team of Apogee Corporation Limited on 16th November, 2021.

Signed by

Name: JAMES CLARK
Role: CFO
Date: 

**Create the perfect secure &
flexible workplace with print,
document & IT services**



