

Modern Slavery Act 2015

Director's Statement – Modern Slavery Act 2015 (the 'MSA Act')

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes AGA Rangemasters' slavery and human trafficking statement for the financial year ending December 2023.

Introduction

This statement sets out AGA Rangemasters' 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 relates to actions and activities during the financial year 1st January 2023 to 31 December 2023.

The Senior Management team at AGA Rangemaster recognises that it has a responsibility to take a robust approach to slavery and human trafficking. AGA Rangemaster is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities of AGA Rangemaster Limited. We are interested in the sale of domestic appliances worldwide.

Our supply chain consists of three tiers operating in the UK, Belgium, France, Germany, Slovakia, Hungary, Spain, Italy, Portugal, UAE, India, Korea, China, Vietnam, Turkey, Slovenia and America. We operate a close working relationship with our suppliers with regular communication and business visits where necessary.

Within our business, all those buying in goods or services have a responsibility to consider modern slavery and ethical trading practices.

Risk Assessment Process

The following is the process by which AGA Rangemaster assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Contracts with direct and indirect suppliers will include clauses on the Modern Slavery Act and risk factors. Zero tolerance for modern slavery and respect for human rights will be built into our procurement processes, supplier contracts and also represented in dialogue with sub-contractors, customers and other business partners.

Relevant Policies

Whistleblowing Policy - AGA Rangemaster encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, AGA Rangemaster. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The AGA Rangemaster

Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retribution.

Anti-Bribery - It is the policy of the Company to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

Employee Code of Conduct – AGA Rangemaster’s code makes clear to employees that their actions and behavior expected of them when representing the company. The Company strives to maintain the highest standards of employee conduct and ethical behavior when operating internally and within its supply chain.

Recruitment / Agency workers’

AGA Rangemaster uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Going forward over the course of the next 12 months AGA Rangemaster will continue to monitor the relationship with all agencies in accordance with the provisions of the Modern Slavery Act.

Due diligence

- AGA Rangemaster undertakes due diligence when considering taking on new indirect suppliers, and reviews its existing indirect suppliers.

This process includes;

- Mapping the indirect supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new indirect supplier by requesting they complete a Modern Slavery Act due diligence questionnaire via AGA Rangemaster supply chain procurement platform.
- Create a risk profile for each indirect supplier, where appropriate, based on the response within the Modern Slavery Act due diligence questionnaire;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan, including the termination of the business relationship;
- Insertion of a Modern Slavery Act clause in our supplier contracts. Contracts with suppliers will include clauses on the Act and risk factors. Zero tolerance for modern slavery and respect for human rights will be built into supplier contracts and also represented in dialogue with sub-contractors, customers and other business partners.

Training

AGA Rangemaster commits to ensuring that individuals employed in the Supply Chain team will undergo training on Modern Slavery. 14 people involved with Supply Chain and Human Resources have undertaken training in this area. Anyone new coming into the business in Supply Chain or Human Resources roles will undergo this training.

Steps Taken

Prior to 2023

AGA Rangemaster has developed a system for supply chain verification, whereby the company evaluates potential suppliers before they enter into our supply chain via a supplier assessment form. All suppliers signed up to our SLA including our Ethical Trading and Anti-Slavery Policies.

A register of approved people suppliers has been generated and a questionnaire issued to all. From this a risk assessment was undertaken for each supplier of people and categorized as low, medium or high risk.

Detailed Audits of 3 main employment agencies were undertaken.

2024

187 New suppliers were identified in 2023 across the business, 2 of which were category A or G.

Those identified as category A and G suppliers in our Supplier on Boarding Process (BPOL040301) signed up to our SLA including a section on Ethical Code of Trading which covers Modern Slavery and Bribery.

Key Measures for 2024

Activity	Due Date	Responsibility
Training of any new Supply Chain & HR staff	December 2024	HR Director
Undertake audit of People Suppliers relating to cleaning	December 2024	HR Director
All new Category G and A suppliers to sign 2023 SLAs	On-going 2024	SCM

Board Approval

This statement has been approved by AGA Rangemasters' board of directors, who will review and update it annually.



Mr Geoff Killer
Group Managing Director, Middleby Residential UK
Date: January 2024 (next review January 2025)