

102-108 Clifton Street, London, EC2A 4HW

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# **OX Products Group UK Limited 2025 Modern Slavery Act Statement**

## Introduction

This statement has been published in compliance with requirements under Modern Slavery Act 2016 and sets out the steps we have taken and are continuing to take to ensure that modern slavery and human trafficking in any form is not taking place in our business or supply chain and expects similar commitments from those it conducts business with.

## **Our Business**

OX Products Group UK Limited a leading manufacturer and wholesaler of products within the construction and DIY retail sectors construction. Operating & supplying business; hand tools, diamond blades, PPE (Personal Protective Equipment), workwear and tools storage

## **Our Commitment**

OX Products Group UK Limited is committed to the prevention of modern slavery and human rights trafficking in all areas of our business. We recognise our responsibility to uphold human rights and ensure fair working condition for all individuals connected to our operation.

We are committed to conducting our operations ethically and with integrity, ensuring that slavery and human trafficking have no place in our business or supply chain.



Diversity and inclusion empower individuals, foster innovation, and create stronger, more equitable organisations and communities.



Employee wellbeing is essential for productivity and happiness, promoting a healthy, motivated, and engaged workforce in any organisation.



Talent development cultivates skills, unleashes potential, and ensures a workforce equipped to tackle challenges and drive future success.



Ethical conduct is the compass guiding organisations toward honesty, integrity, and responsible decision-making, ensuring trust and sustainability.



## **Our Policies on Modern Slavery and Human Trafficking**

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# **OUR POLICIES**



### QUALITY

We provide our customers with a service that fulfils their specified requirements. As a business we have prepared and implemented an Integrated Management System (IMS) which conforms to the requirements of the ISO standards which also takes into account our organisational context.



### **HEALTH & SAFETY**

We place the highest priority in robust Health and Safety practices for all our employees and recognise that our workers are our most valuable asset.

Our Health and Safety management system ensures we take all reasonably practicable steps to ensure the health, safety and welfare of all workers, contractors, customers, visitors and the general public from any injury due to our activities while also complying with all statutory requirements.



#### **ENVIRONMENTAL**

We follow a positive and responsible course of action with regards to all those aspects of our operations which could impact upon the environment and we are committed to fulfil and meet all our compliance obligations. Furthermore, we seek to always act in accordance with good practice, preserving and, where possible, enhancing the quality of the environment.



## MODERN SLAVERY & HUMAN TRAFFICKING

We have a zero tolerance policy to any modern slavery or human trafficking incidents within our business or in any of our supply chain partners. If such an infringement should occur we will ensure that all relevant employees or third parties involved will receive training to understand and identify incidents of modern slavery.



#### **ANTI-BRIBERY**

We value our reputation for ethical behaviour and for financial probity and reliability. We recognise that over and above the commission of any crime, any involvement in bribery will also reflect adversely on our image and reputation. This policy prohibits any personal gain or advantage to our employees representing the company or the brand itself.

OX Global have implemented several policies to mitigate the risk of modern slavery in our business and supply chain.

- 1. <u>P-9 Modern Slavery & Human Trafficking Policy</u>: Outlines our commitment to prevent modern slavery and human trafficking and the responsibilities of our employees and suppliers, both within the UK operation and within the wider supply chain.
- 2. <u>P-8\_Ethical\_Sourcing\_Policy</u>: Details our expectation of how our supplier conduct their business and how they treat the employees.
- 3. P-14 Whistleblowing Policy: Provides confidential channel for employees and suppliers to report any concerns related to modern slavery.
- 4. P-4 Anti Bribery Policy: This policy ensures that we conduct business with a strong ethical behaviour.
- 5. <u>P-18 Human Rights Policy: Our Human Rights Policy sets out our commitment to respect human rights, in line national and international laws. It states our commitment to implement due diligence procedures, to avoid infringing on the rights of others.</u>



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# **Compliance with Modern Slavery and Human Trafficking policy**

All employees are required to read, understand and comply with these policies and must avoid any action or inaction which might lead to a breach of the policy.

Where an employee suspects that these policies are being breached or there is any conflict with them, the employee must immediately advise an OX UK Director or report it via *P-14 Whistleblowing policy*.

Where any supplier, contractor or representative of OX Global suspects that these policies are being breached or potentially breached they must immediately notify the OX Global board of Directors.

## Responsibility for the policy

OX Tools UK Board of Directors have overall responsibility for this policy. Ensuring that all appropriate training is available and for arranging the auditing of systems to ensure compliance with the policy both internally and externally.

# **Due Diligence Process**

OX Products Group UK Limited is actively committed to eradicating human trafficking and slavery from its supply chain. The Company does not and will not permit its employees or subcontractors to engage in any form of trafficking in person and will take appropriate actions if this policy is violated.

OX aims to go above and beyond the standard policy practices of ethics, health and safety, the environment and human rights in its day to day business practices.

We work continuously with our suppliers to ensure we are meeting the demands of our customers' values and requirements. As a member of the SEDEX platform, OX is able to gain an insight into the supply chain to proactively identify the best practices to promote the areas stated above. Using SEDEX has allowed OX to carry out SMETA audits which helps us to challenge and improve the standards of each area within our own operation as well as the supplier sites.

The ETI (Ethical Trading Initiative) base code is constantly reviewed and assessments made. Where necessary, a positive corrective action plan can be implemented to help improve performance and well-being, helping to make the working environment a better place. Furthermore, the SMETA audit doesn't aim to judge whether the performance of a site is just a "Pass", it aims to help the company/site to identify any managerial or operational issues which are then addressed in our strategy of continuous improvement. Ultimately, it is designed to help protect workers from unsafe conditions, overworked, discrimination, low pay and forced labour.







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# **Risk Assessment and Management**

OX Products Group UK Limited is committed to continually assess and manage the risks of modern slavery within our supply chain and within our own operations

OX Products Group UK Limited continually maps risks throughout the supply chain, the supply chain identifies high-risk areas based on geography, industry, and supplier characteristics, the risks are assessed, and appropriate actions are taken.

# **Training**

All our permanent employees participate in mandatory training via Atlas Citation Platform. This includes dedicated monitoring on Human Slavery and Human Rights Awareness. The Employee Handbook reinforces these principles and provides guidance on recognising and reporting concerns.

# **Temporary staff**

We work closely with our recruitment agencies to ensure that all appropriate due diligence processes are rigorously followed. This includes verifying that right-to-work checks and all relevant legal and compliance requirements are fully in place prior to engagement.

This process is monitored thorough annual audits conducted in accordance with OP-4-09-Audit Procedure Agency and Labour Providers.

This statement has been approved by OX Products Group UK Managing Director and will be reviewed annually.

**Name: Simon Wood** 

**Position: Managing Director** 

Date:07/05/2025