

Introduction

Pursuant to s.54 of the Modern Slavery Act 2015, this statement constitutes VJ Technology's slavery and human trafficking statement ("Modern Slavery Statement").

VJ Technology (VJT) has a zero-tolerance approach to any form of modern slavery and we are committed to acting in an ethical manner and with integrity and transparency in our business dealings. This statement outlines the steps taken by VJT to ensure that slavery and human trafficking is not taking place within any part of our business or within our supply chains.

The Modern Slavery Act 2015 prohibits slavery, servitude, forced or compulsory labour and human trafficking (Modern Slavery). VJT is committed to tackling all forms of Modern Slavery that could in anyway be connected to our business and supply chain.

Our Business

VJT is a leading distributor of specialist building products in the UK. Our core product areas are construction anchoring systems, consumables and power tools.

Most of the products VJT distributes have been manufactured by other companies, with a small number of products fabricated in-house.

VJT's product range and list of suppliers is extensive. More information can be found about VJT's products and many of its key suppliers on its website (www.vjtechnology.com).

V J Technology policies in relation to Modern Slavery

VJT is committed to acting ethically and with integrity in all its business dealings and relationships and to taking appropriate and proportionate steps to ensure that modern slavery or human trafficking does not occur in any part of its business or in its supply chains.

VJT has a number of key policies and related principles which are as follows:

- Our Ethics Policy sets out several fundamental principles and values. The policy refers to our respect for human rights, freedom of association and prohibition of forced or child labour.
- Our Ethical Trading and Human Rights Policy sets key principles for VJT and its business partners. VJT commits to:
 - not being involved in human rights violations, either directly or indirectly;
 - operating in accordance with the Universal Declaration of Human Rights;
 - taking account of other internationally accepted human rights standards.
- Our Corporate Responsibility Policy provides that VJT will work to ensure that the welfare of workers and labour conditions within our supply chain meet or

exceed recognised standards.

- We encourage reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation. This applies to workers and other stakeholders, including suppliers.

Steps taken to address Modern Slavery risk

In respect of VJT's UK operations and supplies of materials and products into the UK, the following steps have been taken:

- **Supplier audits and risk assessments**

VJT processes require initial audits of suppliers from outside the EU and many suppliers within the EU. Following this initial assessment, onsite audits are to be conducted as appropriate. Working conditions and ethics are assessed, as are areas such as quality management and health and safety. The audit results inform VJT's assessment of risk and its decision as to whether to work with the supplier.

- **Supply chain due diligence**

In the UK VJT has a compliance system as part of its supplier approval process which considers and verifies products against regulatory and performance standards. The system evolves to meet changing regulatory legislation and guidance and is being extended to cover a wider supplier base and to include specific questions in respect of Modern Slavery.

- **Labour providers**

All personnel providers are engaged on written terms covering aspects such as fair employment and the right to work. All temporary workers are subject to induction which covers relevant VJT policies and procedures, including VJT's ethical standards. VJT regularly reviews and develops its HR policies and controls.

- **Reporting Concerns**

VJT has a confidential whistleblowing process for the reporting of concerns. It is available to employees and agents, contractors, suppliers and customers of VJT.

- **UK operations risk assessment**

Risk areas are under discussion and proposals for further enhancement are being considered.

Within its sphere of influence VJT strives to ensure that its suppliers follow its commitment to ethical conduct, including its approach to forced and involuntary labour. Where non-compliance is identified VJT will engage with the relevant supplier and take appropriate action, which may include removing the supplier's approval.

- **Further enhancements**

Further enhancements to the procurement and supply chain processes of VJT in the UK and more widely in respect of Modern Slavery are being evaluated.

Targets for 2020 to build on our approach to Modern Slavery

- Review any areas of concern and work alongside suppliers, customers and interested organisations to eliminate risk from our business and supply chain.
- Maintain our activity from last year, working with suppliers to help them meet our objectives.
- Review/revise our own brand factory audit programme and establish if this is the most effective way to support our approach to Modern Slavery.
- Review/revise how we can be more effective in collaborating with both customers and suppliers to support our approach to Modern Slavery.

Responsibility

The Chief Executive Officer has lead responsibility for policy implementation within the Group and this statement is signed by the CEO to demonstrate the Company's commitment.

Mark Tomlin



Chief Executive Officer