

Hammond Manufacturing 394 Edinburgh Road North Guelph, Ontario, Canada N1H 1E5

www.hammondmfg.com

Modern slavery statement for financial year 2023

This statement is made pursuant to s.54 of the UK Modern Slavery Act 2015 and sets out the steps that Hammond Manufacturing and related subsidiaries have taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Hammond Manufacturing has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Hammond Manufacturing is a global supplier of enclosures to the electronic and electrical industries, power transformers, outlet strips, data cabinets, and accessories.

Hammond Manufacturing operates in the following countries:

Canada Hammond Manufacturing Co. Ltd. Guelph, Waterloo, , Palmerston, Montreal (11 locations)

USA Hammond Manufacturing Co. Inc. Cheektowaga, New York
UK Hammond Electronics Limited Basingstoke, Hampshire
Australia Hammond Electronics PTY Adelaide, South Australia

Hammond Manufacturing sources from approved vendors in Canada, USA, Europe, India, China, Taiwan and elsewhere.

Our high risk areas

We have taken a special interest in suppliers in China and India. For Chinese suppliers the current focus is on any activities in the Xinjiang Uyghur Autonomous Region to ensure compliance not only with the UK Modern Slavery act but also the US House Resolution 6256 which covers goods produced with forced labour.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 2. 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.
- 3. In all regions where we operate our own facilities we comply with local laws regarding hours of work and wages.
- 4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- 5. 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.

Our suppliers

Hammond Manufacturing operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery and for most this includes on site audits which include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. We operate on a principle of "Know Your Supplier" and rely on regular contact, including factory visits, to ensure that our supply chain meets our standards. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- 1. They have taken steps to eradicate modern slavery within their business
- 2. They hold their own suppliers to account over modern slavery
- 3. They pay their employees any prevailing minimum wage applicable within their country of operations
- 4. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. This training is part of our onboarding process for new staff in these roles.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

• No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the company on January 4, 2024 to reflect our activities in 2023.

Name: Ross Hammond

Signature: #

Date: 04/01/2024