

Modern Slavery Act Transparency Statement for Swisslog (UK) Ltd – Financial Year 2020

OPENING STATEMENT FROM SENIOR MANAGEMENT

Swisslog is dedicated to preventing modern slavery and human trafficking from taking place within its business and supply chain and we place the same expectation on our suppliers. This statement covers the Financial Year 2020 and describes the actions taken by Swisslog (UK) Ltd in relation to the Modern Slavery Act 2015.

STRUCTURE AND SUPPLY CHAINS

Swisslog UK is a wholly owned subsidiary of KUKA AG and operates in the UK within the Consumer Goods and Logistics Automation sector, employing approx. 225 people in the UK. Swisslog UK does not operate any subsidiary companies and we do not employ seasonal labour; however, a small number of student interns are employed on temporary contracts. The following web links provides more information regarding the nature of our business

- www.kuka.com
- www.swisslog.com

Our business requires that we work in conjunction with a range of suppliers from both within the KUKA organisation and from other external organisations. Supplies from within the KUKA organisation cover material handling equipment developed by the organisation, as well as technical and commercial services from within the group. In addition, we purchase equipment from third party organisations for inclusion within our overall supply, together with technical and commercial services used in connection with our solution services and in support of our operation. Most of our internal and external suppliers are based in the EU; however, we do work with a very limited number of suppliers who are not EU based.

POLICIES RELATING TO SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business.

The following policies and directives exist within our organisation which demonstrate our opposition to modern slavery:

- **KUKA Corporate Compliance Manual**
 - <https://www.kuka.com/en-gb/about-kuka/corporate-compliance>

The KUKA Corporate Compliance Manual includes details of KUKA's Corporate Compliance Program together with the associated Group Policies.

- **One KUKA Employee Handbook Policies and Procedures**

The One KUKA Employee Handbook Policies and Procedures handbook is an internal document. It contains Policies and Procedures on areas such as:

- Equality and Diversity
- Family Leave
- Flexitime
- Flexible Working
- Positive Work Environment
- Whistleblowing

- **KUKA Guidelines for personnel policy (2019)**

- [Guidelines for personnel policy \(kuka.com\)](https://www.kuka.com/en/guidelines-for-personnel-policy)

Swisslog and KUKA act responsibly and transparently. They commit themselves to the wellbeing of their employees and emphasize the importance of a safe and healthy work environment.

- **KUKA Guidelines for quality, health, safety and environmental management (QHSE) (2019)**

- [KUKA Guidelines for quality, health, safety and environmental management](#)

Swisslog and KUKA set high standards for their products, systems, and solutions and consider it their corporate and social responsibility to create a sustainable future.

- **KUKA/Swisslog Anti-Slavery Policy**

- [Policies - Guidelines - Certificates](#)

This policy applies to all persons working for Swisslog/KUKA or on its behalf. There is a zero-tolerance approach to modern slavery and Swisslog/KUKA are committed to acting ethically and with integrity in all their business dealings and relationships. Swisslog/KUKA are enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in their own business or in any of their supply chains.

- **Swisslog Code of Conduct for Suppliers**

- [Swisslog Code of Conduct for Suppliers](#)

The Swisslog Code of Conduct for Suppliers defines the principles and requirements of the Swisslog companies regarding their suppliers' responsibility for people and the environment.

Our **Standard Terms and Conditions of Purchase** require that our suppliers warrant that the Contractual Work is being provided in conformity and compliance with all applicable laws and regulations, that the Contractual Work is being provided in conformity with the industrial safety regulations and other regulations in force at the location, that they undertake to conduct their business with integrity and to observe all applicable laws and recognized branch standards (This also applies to generally recognized standards in relation to working conditions, safety at the workplace, and environmental protection), and that the supplier undertakes to refrain from countenancing corruption and violations of competition law and to have in place suitable measures for preventing such. These requirements must be imposed on its staff, sub suppliers, commissioned parties, and other assistants.

RISK AND COMPLIANCE

The following list of risk management activities and/or procedures demonstrates our commitment to compliance with our corporate policies:

- We work with key sector suppliers who have a reputation for commitment to the Health, Safety and Welfare of their employees and suppliers
- We internally share information on suppliers when they fail to work in accordance with our standards, and will identify them as blocked on our purchasing list of approved suppliers
- We ensure that anyone working on our premises or those of our customers, work in accordance with all local Health, Safety and Welfare legislation, and in accordance with our Policies and Procedures

Our suppliers provide us with technically complex products and installation services, and we do not consider that we operate in high risk sectors or locations because modern forms of slavery in our sector of business are not prevalent in the UK or EU where most of our suppliers are based.

We ensure our suppliers are aware of our policies and encourage them to adopt our high standards. We adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains. Upon discovery of a breach of our policies relating to slavery and human trafficking we will terminate any relationship with the relevant supplier with immediate effect.

We previously identified a potential risk further down our suppliers' own supply chains where we have less visibility. To address this, we introduced the Swisslog Code of Conduct for Suppliers, and use the "IntegrityNext" application to qualify and monitor our existing and prospective suppliers.

IntegrityNext enables Swisslog to monitor our suppliers in order to meet regulatory requirements and reduce risk. The IntegrityNext platform manages the supplier self-assessments and certificates while also monitoring for supplier issues and risks on social media. IntegrityNext covers topics, such as:

- Anti-Bribery & Anti-Corruption
- Environmental Protection
- Human Rights & Labour
- Health & Safety etc.

We will continue to focus on this area in future discussions with our suppliers to ensure that our policies are clearly communicated to them and that they in turn ensure their own suppliers are working in accordance with them.

We have a dedicated compliance team, which consists of representatives from the following departments:

- Legal
- Audit and compliance
- Human resources / personnel department
- Procurement
- Sales
- Marketing
- Operations

TRAINING

We aim to ensure all employees work in accordance with the KUKA Corporate Compliance manual and promote awareness through the KUKA intranet page on Corporate Compliance which contains Manuals, Trainings, Group Policies and Documents, as well as Current Topics and FAQ's. Mandatory Corporate Compliance training has been undertaken every 2 years since 2016 and is available as online or offline versions accessible via our Corporate Compliance Intranet page.

HEALTH & SAFETY

Swisslog (UK) Ltd. has a strong commitment to the Health & Safety of employees, suppliers and customers and employ a full time Health & Safety Manager for the UK operation, as well as maintaining our ISO 45001 accreditation. We actively promote the reporting of near miss incidents and have a comprehensive range of mandatory Health & Safety training for employees in accordance with the needs of the individuals.

FURTHER ACTIONS, APPROVAL AND ENDORSEMENT

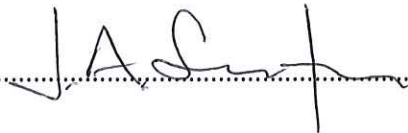
Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we will continue to promote awareness of our Anti-Slavery Policy, ensuring slavery and human trafficking does not take place within our operation.

We will monitor its use and effectiveness during Internal Audits and through feedback from Line Managers and Employees. We will continue to review purchasing from external suppliers and ensure that those involved in the use of Third-Party products and services adhere to the corporate and local policies referenced here.

We will continue to qualify and monitor our suppliers to ensure they operate in accordance with our policies.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Swisslog (UK) Ltd.'s slavery and human trafficking statement for the financial year ending December 31st, 2020.

Signature:
Managing Director
Swisslog (UK) Ltd.



Date:
03-AUG-2021

Signature:
Finance Director
Swisslog (UK) Ltd.



Date:
4/8/2021