

Modern Slavery Act Transparency Statement for Swisslog (UK) Ltd – Financial Year 2019

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 2019 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. 220 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 link provides more information regarding the nature of our business

- 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. The majority 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

The following policies 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>
- KUKA Guidelines for personnel policy (2019)
- One KUKA Employee Handbook Policies and Procedures
- KUKA Guidelines for quality, health, safety and environmental management (QHSE) (2019)
- KUKA/Swisslog Anti-Slavery Policy

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

The KUKA Guidelines for personnel policy (2019) include the following statements:

- We comply with applicable health and safety regulations worldwide and thus limit work accidents and adverse health effects. All activities in the company are subject to high safety standards.

- We treat our employees respectfully. We want our employees to work in a healthy, safe, and fair environment, one which is characterized by tolerance and acceptance and is free of prejudice.
- All employees are valued and must never be discriminated against based on their ethnicity or origin, gender, faith, religious beliefs or ideology, age, physical or mental disability or sexual orientation.
- Our employees receive fair wages and salaries. We adhere to the statutory minimum wage regulations.
- We respect our employees' right of association in trade unions as well as their representatives, and our tariff-bound companies adhere to the results of wage negotiations.
- We include employees and their union representatives in matters related to safety and health at work.
- Sexual harassment and any other form of bullying is not tolerated. The privacy and dignity of others must be respected at all times.
- We are committed to respecting and protecting international human rights. Forced labor, child labor and trafficking are never acceptable in any shape or form.

The One KUKA Employee Handbook Policies and Procedures handbook contains Policies and Procedures on areas such as:

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

DUE DILIGENCE PROCESSES RELATING TO SLAVERY AND HUMAN TRAFFICKING

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 the vast majority 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.

Where we have identified a potential risk is further down our suppliers' own supply chains where we have less visibility and we will focus on this area in future discussions with our suppliers to ensure that our policies are clearly communicated to our suppliers and that they in turn ensure their own suppliers are working in accordance with them.

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

We have strengthened Swisslog (UK) Ltd.'s commitment to Health & Safety of employees, suppliers and customers by employing a full time Health & Safety Manager for the UK operation, and have successfully achieved ISO 45001 accreditation in 2018. We actively promote the reporting of near miss incidents and have introduced an enhanced range of mandatory Health & Safety training for employees.

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 review our Purchasing Terms & Conditions to ensure they continue to reflect the KUKA policy objectives.

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, 2019.

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James Sharples
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Signature:

Managing Director

Swisslog (UK) Ltd.

20.11.2020

Date: