



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 December 2022.

Bergstrom Europe Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational structure

Bergstrom Europe Ltd is the subsidiary of the Bergstrom Inc group, the parent company being Bergstrom Inc, and has business operations in the United Kingdom, as well as:

- United States
- China
- Spain
- Mexico
- India

We operate in the Manufacturing sector. The nature of our supply chains is as follows: We work with a number of key direct suppliers, who provide us with goods, such as components for our products, and services, such as outsourced business processes and IT processes.

For more information about the Company, please visit our website:

www.bergstromeuropa.com.

Policies

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

These include the following:

- Recruitment and selection policy - We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check where employees may be working with vulnerable people.
- Supplier code of conduct - We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.
- Staff code of conduct - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.

We make sure our suppliers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- External supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.

We do not consider that we operate in a high-risk environment. The business operates in this risk level environment because the majority of our supply chain is intercompany or based in the UK and Europe and in low-risk industries.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices on an annual basis

The statement is approved by the board of directors.



Nick Wilkinson
Managing Director

Date: 21st March 2023