

Modern slavery and human trafficking statement

Introduction

This statement sets out Snorkel Europe Ltd.'s approach to understanding and addressing any potential slavery and human trafficking risks within its business and supply chains. Snorkel takes this matter seriously and is committed to improving our practices to combat slavery and human trafficking.

This statement relates to actions and activities during the financial year 2020 to 2021

The organisation's structure, its business, and its supply chains

Snorkel Europe Ltd is a subsidiary of Xtreme Manufacturing LLC and HQ is based in Nevada, USA. There are five Snorkel manufacturing sites and over 200 distribution locations, selling and servicing Snorkel equipment Worldwide. Snorkel manufacturing facilities are based in Nevada, USA; St Joseph, Missouri; Washington, UK; Levin, New Zealand and Jintan, China.

Snorkel Europe Ltd is a Global manufacturer and distributor of powered access platforms. Head office for European manufacturing is based in Washington, United Kingdom employing 180 people. Snorkel Europe Ltd generates \$55 million in sales. The Company purchases sustainable equipment parts via a Global supply chain which is evaluated and audited for constant reliability and compliance.

The organisation's policies in relation to slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking within our supply chains or any part of our business. The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and modern trafficking in its operations:

- HRP009 – Public Interest Disclosure (Whistle-blowers) Policy
- HRP048 – Ethics and Conduct Policy
- supplier/procurement code of conduct

The organisation's due diligence processes in relation to slavery and human trafficking and in its business and supply chains.

As part of our initiative to identify and mitigate the risk of slavery and human trafficking occurring within our business and supply chains, the organisation undertakes due diligence when taking on new suppliers and regularly reviews its existing ones. This includes:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier (questionnaire sign off TBA);
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices and requiring them to implement action plans;
- ensure suppliers are checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

The organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against relevant performance indicators

Snorkel Europe Ltd has reviewed its key performance indicators (KPIs) and as a result, the organisation is:

- requiring staff working in supply chain/purchasing, quality, engineering, sales and product support including all managers and HR professionals to have completed training on modern slavery by 31st January 2021;
- developing a system for supply chain verification expected to be in place by 31st March 2021, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chain, whereby the organisation will provide a written copy of the Snorkel Supplier Code of Conduct requiring each supplier to confirm compliance in writing by 31st March 2021.

The training about slavery and human trafficking available to the organisation's staff

As a result of Snorkel's review of its effectiveness of identifying and reducing the risk of slavery and human trafficking in its business and supply chains, the organisation requires staff working in supply chain/purchasing, quality, engineering, sales and product support including all managers and HR professionals to complete mandatory training in recognizing and reporting Modern Slavery and Human Trafficking

Endorsement

The statement has been approved by Snorkel Europe Ltd Senior Executives who will review and update it on an annual basis.

John Gill
Chief Manufacturing Officer
Snorkel Europe Ltd
24th November 2020

