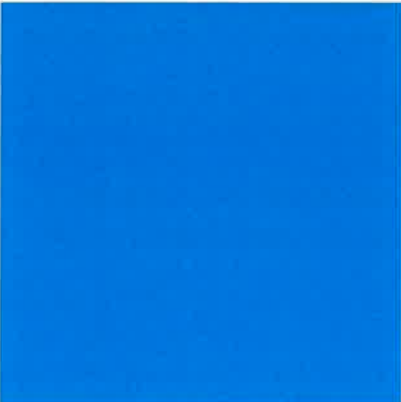




Modern Slavery Policy Statement



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INTRODUCTION

We recognise that slavery and human trafficking remain a major world concern and we are committed to managing our business and supply chain so that it is untainted by either of these offences.

Apogee Group Limited is committed to providing a work environment that is free from human trafficking, forced labour and unlawful child labour (“human trafficking and slavery”). The Company strongly believes that it has a responsibility for promoting ethical and lawful employment practices. These practices are also required to be followed by our suppliers and subcontractors.

We run our business and manage our supply chain with regard to our obligations under the Modern Slavery Act 2015 and conduct periodic reviews of our supply chain in order to assess the level of risk that these practices could exist within the chain.

ORGANISATION’S STRUCTURE & SCOPE

This Policy relates to the business and operations of Apogee Group Limited, this includes; Apogee Corporation Limited, Apogee Corporation (Ireland) Limited, The Danwood Group Limited, Printware Limited, Danwood Jersey Limited, Phoenix Office Supplies Limited, Office Perfection Limited, BAS-Burosysteme GmbH, KRR GmbH and any of the Apogee brands which include Apogee Digital Document Services, Apogee Managed Services, Apogee Direct and Apogee Desktop Services. Unless otherwise stated, all references to “Apogee”, “we” or “our” in this statement shall include all entities of Apogee Group Limited (6445564).

Apogee Group Limited is an independent specialist in print related technologies supplying equipment and services to customers in the UK, Republic of Ireland, Jersey and Germany. Apogee Corporation Ltd has its head office in Maidstone in the UK; with operational offices across the UK, Republic of Ireland, Jersey and Germany.

OUR SUPPLY CHAIN

Our supply chain includes the sourcing of print and IT hardware, software solutions, consumables and service related items that are principally related to print and IT technologies and the maintenance of the same.

DEFINITIONS

Human Trafficking: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Forced Labour: all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

Harmful Child Labour: consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

POLICY

Apogee Group Limited will not tolerate the use of unlawful child labour or forced labour in the services it provides and will not accept products or services from Suppliers that employ or utilise child labour or forced labour in any manner.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

RESPONSIBILITIES

The Chief Executive Officers have overall responsibility to ensure the principals of this policy and the Modern Slavery Act 2015 legislation are always adhered to during any business activities carried out by the Company, including the procurement of any supplier relationships.

All employees of Apogee Group Limited have a duty to report any concerns or suspicions of human trafficking and slavery in any part of the business or its supply chain at the earliest stage possible so appropriate action can be taken. Reports can be made to the employee's line manager or directly to either Chief Executive Officer. The Company's Whistleblowing Procedure may also be used.

DUE DILIGENCE / SUPPLIER REQUIREMENTS

The Company makes a commitment to undertaking the following due diligence:

- Reviewing our own supply chain in order to identify areas of greatest risk.
- Auditing our current suppliers with an ongoing monitoring programme.
- Reviewing our procurement procedures and updating of contracts.
- Updating the Code of Conduct to ensure employees are aware of our obligations under the Modern Slavery Act

Modern Slavery Policy Statement Modern Slavery Act 2015

- Appointing our Service and Supplies director as the company representative with day to day responsibility for compliance with our obligations.

The Company will require suppliers to the business to confirm the following before carrying out any business with them:

- They will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
- They will ensure that the overall terms of employment are voluntary;
- They will comply with the minimum age requirements prescribed by applicable current legislation unless a specific contract contains stricter age requirements;
- They will ensure its workers are provided with wages and benefits that meet or exceed the legally required minimum;
- They will abide by the Working Time Directive with regards to working hours and rest breaks

Any employee involved in the engagement and procurement of suppliers to the Company must communicate the principles above at the outset and throughout the business relationship.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Reported incidents of Human Trafficking, Forced Labour or Harmful Child Labour within the supply chain of Apogee
- Number of suppliers with a written public commitment to the principals of this policy regardless of being obligated by the Modern Slavery Act
- Number of supplier audits conducted against organisations within the Apogee supply chain that have extended chains of supply within countries that are rated CCC or lower by The Global Slavery Index 2016.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we will continue to monitor the supply chain and ensure to engage with suppliers on the issues of slavery and human trafficking; demonstrating an ongoing commitment ensuring that these practices do not exist within the supply chain.

The Company may terminate any relationship with business suppliers if they do not comply with the legislation and principles above.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 5th April 2019.

Signed



Mark Smyth
Chief Operating Officer
Apogee Corporation Limited

Effective: 17th May 2019