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Issue History

Issue	Date	Reason for issue	Author	Owner
1	Jan 2022	New policy	Jo Pollard	Jo Pollard
2	May 2024	Re-coding and review	Kelly Francis	Jo Pollard

Modern Slavery Statement and Policy

Introduction

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Coopers Fire, we take the lead from our parent company Lowe and Fletcher and have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business and to implement steps to prevent slavery and human trafficking during the financial year.

Coopers Fire

Coopers Fire is part of the Lowe & Fletcher Group, a fifth-generation, privately owned family business founded in 1889. The business is split into two operating divisions which a Group Head Office oversees:

Coopers Fire is part of the Safety and Security Systems Division which is active in the design, manufacture, supply, installation, and maintenance of smoke and fire curtains.

Coopers Fire operates from our main headquarters in Waterlooville, Hampshire, UK employing approx. 200 people and a satellite site in Sutton Coldfield, UK with approx. six people employed. There are also approx—35 field-based engineers. Our employees are from both skilled and semi-skilled backgrounds including design and project engineers, manufacturing personnel, and installation specialists.

The Coopers Fire Strategy Statement:

“As part of the Lowe & Fletcher Group, a family business since 1889, we use our experience and expertise to add value for our customers worldwide.



Vision

To save lives through quality and innovative products and to raise awareness of effective fire protection.

Our values are embedded in our family business ethos. They enable us to develop as a team, invent new things, and plan for the future with conviction and confidence. They can be summed up as follows:

- We act with honesty, openness and respect for others;
- We act with care and consistency;
- We take responsibility for our actions.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and onboarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, and environmental standards, and references.

Operations and Supply Chain

Coopers Fire design, manufacture and distribute products across domestic and international markets to a diverse range of customers. Operations include both manufacturing and assembly processes requiring the use of bought-in raw materials, components and services. Our supply chain extends across the World. Whilst confident that it is compliant with modern slavery and human trafficking laws, we recognise that in some countries the risk is increased and we undertake procedures to ensure that all suppliers are compliant with legislation.

Compliance and Risk

Coopers Fire uses risk management procedures and proactive measures to ensure that its operations are not exposed to the risk of modern slavery and human trafficking occurring within its supply chain. These procedures are supported by corporate policies and ensure that the business complies with all applicable laws and regulations.

We are committed to engaging with all stakeholders, including suppliers, to address the risk of modern slavery and human trafficking in our operations and supply chain. Coopers Fire maintains a zero-tolerance approach to modern slavery. Due diligence is ongoing and we ensure the following is undertaken:

Suppliers are assessed on their quality, price, and risk in their ability to supply us. This includes close co-operation with all external suppliers to ensure their ethics and values are reflective of those of Coopers Fire. New and existing suppliers are assessed to ensure their standards meet ours.

- All potential employees of Coopers Fire are assessed regarding their right to work.
- All employees are aware of and are expected to work within our own and national equality policies to promote and encourage an environment of cultural inclusion and diversity.
- Coopers Fire actively enforces a culture of ethical trading covering the aspects of anti-corruption, anti-bribery, fraud, gifts and hospitality.
- Salary and wages are compliant with relevant local government legislation.
- Coopers Fire continue to inform employees and assess suppliers of the risks surrounding modern slavery and human trafficking.

Awareness

Coopers Fire has raised awareness of modern slavery issues by putting up posters across our facilities and our intranet site focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery (this policy)
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

The following people will require mandatory training on modern slavery:

- Managing Director
- HR Department
- QHSE Department
- Supply Chain Team
- Head of Service
- Head of Commercial and Projects

Records of training will be retained.

Awareness training will be provided to all other staff that captures the latest advice from the GOV.UK website via the linked video and new guidance which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers about slavery policies and controls
- What steps Coopers Fire will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Coopers Fire anti-slavery policy

Measuring our performance

Coopers Fire has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?
- How many issues have been made by our employees of concerns regarding modern slavery?