

Modern Slavery Act 2015 Slavery and Human Trafficking Statement

OUR POLICY

Kondor Ltd is opposed to slavery and human trafficking in any part of our activities or our supply chain. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

OUR BUSINESS

We are a distributor of products in the technology sector. Seasonal work is a feature of the industry in which we operate. More information on our business is available at <https://www.kondor.co.uk/>

We are a part of the DCC Group. DCC is an internal sales, marketing, distribution and business support services group. Its headquarters are in Dublin, Ireland and it is listed on the London Stock Exchange. DCC Currently has operations in 15 countries and employs over 11,000 people. More information on the DCC Group is available at www.dcc.ie

OUR STRUCTURE

Our business is organised into the following business units: Commercial, Sales & Business Development, and Warehouse Operations. We distribute a wide range of products from the world's leading brands and also provide specialist sales support, logistics and supply chain services.

OUR SUPPLY CHAINS

The majority of the products we sell are sourced from reputable suppliers who are based in the UK and the European Union. We also source a number of products from Australia, China, Hong Kong, Korea, the Philippines, and the United States.

Kondor Ltd also procures local goods and services to support its general business functions, examples include:

- Cleaning Services, which we procure from a facilities management provider
- Temporary workers, which we procure from a recruitment agency

The facilities management and agency staff are identified as risk areas. As a result, we've prioritised these service areas for due diligence.

CONFLICT MINERALS

Conflict Minerals are minerals that are mined and/or smelted in conditions of armed conflict and human rights abuses. The minerals that are most commonly linked to conflict or human rights abuses are gold, tin, tungsten and tantalum, where they are mined in Indonesia, Democratic Republic of Congo or the Great Lakes Region in Africa.

These minerals are used in modern electronics which is why we are focussing on conflict minerals in particular when it comes to managing the risk of modern slavery.

Although we don't have a direct commercial relationship with foundries and mines, we expect any of our suppliers that do to minimise this risk as outlined in our Kondor Supplier Manual issued to every supplier that we work with. Managing the risk of conflict minerals has continued to be a routine part of our supplier due diligence.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

The DCC Code of Conduct sets out our Group commitment to acting ethically and with integrity towards our employees and in all our business relationships. In addition, the DCC Group Supply Chain Integrity Policy sets out the approach taken by every business in the DCC Group to ensuring that all the products we sell meet applicable legal and ethical standards. Both of these documents are available at dcc.ie.

Mandatory training courses on these policies are made available through a portal managed by human resources.

Our policy on slavery and human trafficking is set out at the commencement of this statement. The requirements of our Code of Conduct, Group Supply Chain Integrity Policy and our own policy are reflected in the more detailed policies and procedures that we have in place in Kondor.

PROCEDURES ON SLAVERY AND HUMAN TRAFFICKING

As part of our compliance with the policies referred to above, we take the following steps:

- Assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the directors of Kondor Ltd.

ASSURANCE AND KEY PERFORMANCE INDICATORS

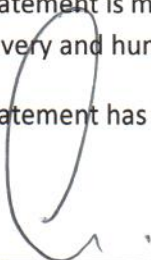
We report on compliance with the DCC Group Code of Conduct and Supply Chain Integrity Policy every six months. The group has adopted the following key performance indicators in relation to slavery and human trafficking:

1. Operations and suppliers considered to have a significant risk for incidents of forced or compulsory labour in terms of:
 - i. Type of operation (such as a manufacturing plant) and supplier;
 - ii. Countries or geographic areas with operations and suppliers considered at risk

NATURE OF THIS STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2020.

This statement has been approved by the board of directors of Kondor Ltd.



Gary Fowle
Chief Executive Officer

26/02/2019