

# Focusrite's Anti-Slavery & Human Trafficking Statement

## INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

We are committed to combating slavery and human trafficking. We are a manufacturer in the music technology sector. The Focusrite Group consists of Focusrite plc, Focusrite Audio Engineering Limited, Focusrite Group US, Inc., Focusrite Investments, Inc, Focusrite Novation Asia Limited, Focusrite Australia Pty Ltd., Optimal Audio Group Limited, Martin Audio Limited, Pro Audio Beteiligungs GmbH, ADAM Audio GmbH, ADAM Audio Business Service Co., Ltd (Group), Linea Research Holdings Limited<sup>1</sup>, Linea Research Limited, Herts & Beds Electronic Services Limited and Sequential LLC. The ultimate parent company is Focusrite plc. Focusrite plc has its head office in the United Kingdom. The Group has nearly 400 employees worldwide and has offices in the United Kingdom, the United States of America, Germany, China Hong Kong and Mexico. In the financial year ending 31 August 2021 the global annual turnover of the Group was £173.9m.

## OUR SUPPLY CHAINS

Our supply chain is our greatest risk area for exposure to modern slavery practices and human trafficking. The Focusrite Group has a global network of suppliers but our key partners are primarily based in China and Malaysia. The Focusrite Group currently operates the following manufacturing sites:

Brand	% in-house manufacturing	% contract manufacturer
ADAM Audio	12	88
Focusrite	0	100
Linea	100	0
Martin Audio	50	50
Sequential	0	100

Our key contract manufacturers operate with a minimum accreditation of ISO 9001 and ISO 14001. The Focusrite brand's largest manufacturer also holds SA8000 and OHSAS18001 accreditation and has a strong, active Corporate Social Responsibility program in place to improve worker engagement, health and safety. We remain committed to eradicating slavery and human trafficking through a combination of risk assessment, collaborative programmes, policies and activities which help us identify, mitigate and manage the risk.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. Focusrite's Anti-Slavery and Human Trafficking 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.

## DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, questions are asked of each supplier to ensure that its practices and policies conform to the Group's policies and the relevant legislative provisions. We have in place systems to:

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<sup>1</sup> Note the Linea group companies were acquired in March 2022 and whilst due diligence enquiries were made at the time of acquisition, they were not included in our annual survey of suppliers.

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

In the past 12 months the Covid-19 pandemic has severely limited our ability to travel and we have been unable to carry out in full our usual programme of due diligence and in-person monitoring of supplier sites. With restrictions easing we expect to recommence our regular site visits to our suppliers and bespoke in person investigations which form a key part of our anti-modern slavery investigations.

Concerns about slavery and human trafficking may be raised by employees and contractors through our existing whistleblowing procedure. During the last 12 months, there have been no concerns raised regarding allegations of slavery or human trafficking. Had there been any such concerns, appropriate investigations and remedial action would have been undertaken, including the potential termination of the relevant supply contract if remediation proved to be unsuccessful.

#### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have a zero tolerance approach to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have in place a supply chain compliance programme. The Focusrite Group’s Anti-Slavery and Human Trafficking Policy is reviewed annually and it is a requirement that each of the group companies top twenty contract manufacturer completes a slavery and human trafficking due diligence questionnaire to ensure that the supplier has warranted its compliance with the Modern Slavery Act. Compliance is led by the legal department who involve those members of the Finance, People and Operations departments as necessary.

In the twelve month period to 31 March 2022 The Focusrite Group’s anti modern slavery due diligence questionnaire was sent to the top twenty suppliers to each of the Focusrite, ADAM Audio and Optimal Audio group companies. Replies are analysed and any additional questions are picked up directly with the relevant supplier.

#### **AWARENESS RAISING AND TRAINING**

We continue to develop our training programme to give our People a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. An introduction to our modern slavery and human trafficking practices and policies has formed part of the induction process for each new member of the Focusrite group companies.

Number of people enrolled in a training programme	Number completed training	% completed training
332	310	93

#### **REPORTING ON OUR PROGRESS**

In this statement, we have set out the steps that we have taken to prevent modern slavery and human trafficking in our business and supply chains. We realise that this will be an ongoing process and going forward we will demonstrate the progress that we are making each financial year through certain key performance indicators. In the financial year ending 31 August 2022 we will take action to increase the number of suppliers who return a completed due diligence questionnaire and ensure training is rolled out across the whole of the Focusrite Group.

#### **MODERN SLAVERY ACT 2015 COMPLIANCE**

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 31 August 2021.

Tim Carroll

Chief Executive Officer

Approved by the board of directors 24 March 2022