Gates Industrial Corporation plc
Modern Slavery Act Statement

This statement has been published in accordance with the UK Modern Slavery Act of 2015, but is intended to comply with any applicable legislation in any state or country in which Gates operates or engages in commercial transactions. It describes the actions taken by Gates to prevent slavery and human trafficking in its manufacturing operations and supply chains.

Commitment and Reporting

Gates recognizes that slavery, forced labor and human trafficking (collectively, “modern slavery”) are a global and growing concern given the rapid rise in international migration in every type of economy, whether industrialized, developing or in transition. Gates has zero tolerance for any form of modern slavery within its operations and supply chains. Gates recognizes a responsibility to be alert to risks in its operations and supply chains, and to act upon any concerns. Any issues or concerns regarding modern slavery at Gates or in its supply chains can be confidentially and anonymously reported by employees or third parties by using one of the following methods:

(a) in writing to Gates Industrial Corporation plc, Attn: Audit Committee/Chief Legal Officer, 1144 Fifteenth St., Suite 1400, Denver, Colorado 80202;

(b) by sending an e-mail to compliance@gates.com;

(c) by calling (toll free) the number appropriate to the applicable language or location listed on Annex A to Gates’ Code of Business Conduct and Ethics (available on gates.com) or as found on gatescorp.ethicspoint.com; or

(d) by accessing the web portal of Gates’ third-party provider at gatescorp.ethicspoint.com or the web portal of any successor third party provider as may be approved from time to time by Gates.

In addition, Gates’ Code of Business Conduct and Ethics (Code), its Human Rights Policy, and its Supplier Code of Conduct (Supplier Code), all located on its corporate website at gates.com, describe Gates’ commitment to ensuring that its products are manufactured under conditions that demonstrate respect for the people who make them and the communities in which they are made, and its requirements that its suppliers and distributors engage in and maintain lawful, efficient and fair labor practices. Gates requires that the conditions in its supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

Business Structure and Supplier Relationships

As part of Gates’ initiative to identify and mitigate the risk of modern slavery, Gates has implemented and enforces effective systems and controls to ensure slavery and human trafficking are not taking place in its supply chains. Suppliers are obligated in all of their activities to operate in full compliance with the laws, rules and regulations of the countries in which they operate. Those obligations are enforced through Gates’ due diligence and
compliance processes, appropriate contractual provisions, and its Supplier Code. Gates’ suppliers and distributors must complete a rigorous pre-screening and due diligence process, which includes screening such entities against numerous global anti-corruption and sanctions lists. This screening, and any additional due diligence Gates deems necessary, is conducted in coordination with third party providers to Gates. Gates’ suppliers are also aware that Gates may, with or without notice, conduct audits of their operations, their subcontractors and their next tier suppliers, to evaluate compliance with Gates’ Code and Supplier Code and applicable laws and regulations.

Training

To ensure a high level of understanding of the risks of modern slavery in its supply chains, Gates provides training to key staff in its operations, procurement and commercial teams, to upskill staff on the implementation of relevant compliance policies, procedures and processes.

This statement has been approved by the Board of Directors of Gates and constitutes the Company’s modern slavery statement for the financial year ending 1 January 2022.

Ivo Jurek
On behalf of Gates Industrial Corporation plc
July 26, 2021