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 of companies consists of Focusrite Plc, Focusrite Audio Engineering Limited, Focusrite Novation, Inc., and Focusrite Novation Asia Limited (Group), and the ultimate parent company is Focusrite Plc. Focusrite Plc has its head office in the United Kingdom. The Group has over 170 employees worldwide and has offices in the United Kingdom, the United States of America, Germany and Hong Kong. In the financial year ending 31 August 2015 the global annual turnover of the Group was £48m.

OUR SUPPLY CHAINS

All Focusrite contract manufacturers operate with a minimum accreditation of ISO 9001 and ISO 14001. Our largest manufacturer, representing approximately 70% of our total manufacturing, also holds SA8000 and OHSAS18001 accreditation with a strong, active Corporate Social Responsibility program in place to improve worker engagement, health and safety.

Each supplier is visited at least three times per year by the Operations Director to perform quarterly business reviews. In addition to these visits, other Focusrite employees are present in the various contract manufacturer factories at some point during most months of the year to support new product introduction and ongoing production. During each visit an active interest is taken in worker well-being. Production lines, dormitories and canteens are also regularly visited.

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. 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.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk, during our regular manufacturer meetings 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:

- 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.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance 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.

As part of the regular quarterly business review programme, suppliers’ conformance to slavery and human trafficking is discussed in order to assess and manage risk. The Focusrite Anti-slavery and Human Trafficking Policy is reviewed annually with each supplier, and it is a requirement that each 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 and Focusrite’s policies.

We have a compliance team, which consists of involvement from the following departments:

- Legal (including the company secretariat);
- Finance;
- Human resources; and
- Operations (including procurement).

**TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. An introduction to our modern slavery and human trafficking practices and policies forms part of the induction process for each new member of staff.

**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 2016.

Dave Froker

*Chief Executive Officer*

19 October 2016