

The background of the top section is a blurred photograph of a factory or warehouse. In the foreground, a person is walking from right to left. The background shows various pieces of equipment, including what appears to be a green forklift, and other workers in the distance. The overall scene is brightly lit, suggesting an industrial environment.

iRobot UK Limited - Modern Slavery Act Transparency Statement

Introduction

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Act Transparency Statement for iRobot UK Limited (also referred to as “we” “us” and “our” in this statement) for the financial year 31 December 2017 to 29 December 2018.

This statement sets out iRobot’s actions to understand all potential modern slavery risks in relation to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in our business and supply chains.

iRobot recognises that it has a responsibility to take a robust approach to slavery and human trafficking and we are pleased to share our guiding principles and the work we do to ensure the integrity and dignity of all those who are involved in our business and supply chains.

Whilst this statement relates to our UK business, our approach to modern slavery and human trafficking is consistent across our Group.

Our Business and Group Structure

The iRobot Group (the “Group”) is the leading global consumer robot company and we design and build robots that empower people to do more both inside and outside of the home.

iRobot UK Limited is a wholly owned subsidiary of iRobot Corporation. We have subsidiary undertakings in France, Spain, Germany, Belgium, the Netherlands, Austria and Portugal.

The Group has over 1030 employees worldwide and operates in 11 countries. iRobot UK Limited has approximately 38 employees and is primarily dedicated to Group’s business in the UK and overseeing additional sales and marketing activities in Europe and the Middle East.

Our Supply Chains

Our manufacturing strategy is to outsource non-core competencies, such as the production of our robots, to third-party entities skilled in manufacturing. By relying on the outsourced manufacture of our robots, we can focus our engineering expertise on the design of robots and associated technologies. We outsource the manufacturing of our consumer products to three contract manufacturers, each of which manufactures our robots at a single plant in Southern China. In addition, in 2019 one of our contract manufacturers will begin manufacturing at a second plant in Penang, Malaysia. We also work closely with our component supplies to ensure standards are met.

Our Policies on Slavery and Human Trafficking

iRobot is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We comply with applicable laws and regulations in the countries where we manufacture products and we expect our business partners to comply with applicable laws in the countries in which they operate. iRobot has committed itself and its suppliers to comply with the internationally recognized minimum social and labour standards as laid out in the Conventions of the International Labour Organization. We would never knowingly do business with any partner who engages in human rights violations whether it involves the use of child labour, forced labour, discrimination, harassment, occupational health and safety, requiring excessive working hours, human slavery or human trafficking issues.

Relevant Policies and Training

We are committed 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.

We also maintain standards and procedures for employees and suppliers in our Code of Business Conduct and Ethics, which all iRobot employees receive training on.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, our internal audit team, in conjunction with our manufacturing oversight function, invests significant time and resources to audit our contract manufacturers and the factories that build our robots.

Our internal audit team performs an independent audit and verification of key non-U.S. manufacturing facilities for compliance with our supplier agreements. Audits are announced and scheduled, which helps us build trust with our key manufacturing partners.

Our manufacturing oversight team, located in Guangzhou, China, makes unannounced visits to our key manufacturing partners and suppliers.

Third party audit reports and certifications from industry specialists (e.g. Electronics Industry Citizen Coalition and International Council of Toy Industry's Care Foundation) assessing minimum wage, living conditions, overtime, working conditions, child labour laws and the applicable labour and environmental laws are also periodically obtained for key suppliers.

We believe that these audits allow us to identify and assess potential risk areas in our supply chains and to mitigate the risk of slavery and human trafficking occurring in our supply chains.

Supplier Adherence to Our Values

iRobot works with our contract manufacturers, suppliers and vendors (collectively "Suppliers") to maintain fundamental labour and human rights standards. Specifically, we include policies in our key supplier agreements requiring compliance with all applicable local government regulations regarding minimum wage, living conditions, overtime, working conditions, child labour laws and the applicable labour and environmental laws. In addition, we also require our suppliers to warrant that they (and their subcontractors/suppliers) do not use any form of forced prison labour and/or child labour under the age of 15 or the minimum age required by local law, whichever is older.

iRobot is also committed to individuals' rights to work freely, bargain collectively and be compensated fairly and we do not permit discrimination against or harassment of our colleagues who chose to be represented by a trade union.

Suppliers failing to meet our standards would be in breach of our supplier agreements allowing us to take action accordingly.

iRobot remains committed to upholding human rights and safety in our business and supply chains and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement has been approved by the board of directors of iRobot UK Limited on February 4, 2019

Glen Weinstein
Director

Karian Wong
Director

Jean-Jacques Blanc
Director