

## Modern Slavery Statement

### Introduction:

As part of our 2035 sustainability journey, we are committed to eliminating risks and acts of modern-day slavery and human trafficking within our business and from within our supply chains. Our key initiatives to combat modern slavery includes (but not limited to) - generating internal and external awareness through training and engagement, following UK government regulation and internal HR policy for recruitment, collecting information from our supply chain through SEDEX and internal survey to identify risk areas, and taking initiatives to reduce the risk and acts of modern day slavery and human trafficking.

Although, our annual turnover is under the revenue threshold and we are not legally obliged to report on slavery and human trafficking; however, this statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.

### Business Structure and Supply Chain:

We are the supplier of PPE, consumables, site welfare, equipment and tools to the UK construction industry and are an independent company operating mainly within the UK. Our corporate office and warehouse are located in Three Bridges, Crawley- West Sussex. Our supply chain comprises of manufacturers and exporters from UK, Europe, Far East and US.

As an organisation, our supply chain strategy is to buy local or from close geographic proximity (where it is possible) to reduce the carbon footprint, and from the suppliers who have degree of openness to exchange information to combat modern day slavery and human trafficking together; however, this is against our values to discriminate any manufacturer or supplier because they are based in the region where there was an history of violating human rights.

We believe in continuous excellence and collaboration to reduce the risk and acts of modern day slavery in our business and within our supply chain.

### Key Essence of Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or in our supply chains. However, we argue that due to the reach and complexity of global supply chain, it is only possible to combat modern slavery by doing the due diligence. This policy reflects our efforts to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective policies and controls to

ensure slavery and trafficking are not taking place anywhere within our business and supply chains.

### **Due Diligence**

Based on our learning and external collaboration with 'Supply Chain Sustainability School' and subject matter experts, we do believe that 'Due Diligence' includes (but not limited to)- internal training, stakeholder engagement, grievance & remediation, reporting, procurement, mapping and risk management.

We consider ourselves to be a 'low risk' business with regard to slavery and human trafficking due to our business structure and supply chain strategy. We are a business entity that mostly operate within UK. In terms of our supply chain, less than 10% of our products (by spending) are sourced from countries that are located outside UK and Euro Zone, such as- Taiwan, China, India and US.

We nurture a culture that encourages the identification and reporting of any such risks within our business. We recruit all our employees either directly or through accredited recruitment agencies. Some of our staff are from outside the UK, however we check all of the relevant documents, such as- BRP, passport validity, visa type, NIN, etc. to ensure compliance with the Home Office regulations. We also recruit temporary workers for our warehouse operations through accredited third party recruitment agencies.

We are a living wage employer and ISO 45001 certified company. We continuously work to ensure health and safety of our employees at workplace and to improve employee welfare.

We are a gold member and partner of Supply Chain Sustainability School. All of our directors, functional leaders and relevant stakeholders are using tools and resources provided by Supply Chain Sustainability School to enhance their knowledge on the subject matter.

### **Assessing and managing risk**

We have a whistleblowing policy in place and, as part of our efforts to identify and mitigate risks within our supply chain, we are further strengthening our systems and policies to identify, assess and monitor potential risk areas, and eliminate the risks by taking right initiatives.

We have started registering 'source of origin' data in our system against products and suppliers, and continuously working to improve the data quality so that it can be a useful piece of information in the event of any human rights violation or catastrophe in any given geographic location. We have recently joined SEDEX as a 'Buyer-Supplier' member and will be working with them to map our supply chain based on 'risk rating' by Q3, 2021.

However, we have an internal 'risk mapping' of suppliers based on the survey that we had conducted in Q1 2021, which covered areas such as- internal policies regarding modern slavery and human trafficking, external accreditations, such as SEDEX membership, availability of social audit report (such as- SMETA) and relevant ISO certifications (such as- ISO 45001), etc. With this approach, we are currently checking the health of our supply chain in relation to modern day slavery and human trafficking at finished goods level.

As part of our continuous improvement process, we will enhance the reach of our supply chain health checking programme to the level of suppliers of our key suppliers.

### **Effectiveness in combating slavery and human trafficking**

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chains comply with our values, we are putting in place a supply chain compliance programme that will require our suppliers to confirm that they have a slavery and human trafficking policy in place and that they require the same from their suppliers.

We do background check on our suppliers to ensure products were sourced ethically. 'Ethical Sourcing Supplier Condition of Trading and Code of Conduct' is our internal document that suppliers need to sign to ensure that goods must have been produced:

- Lawfully, through fair and honest dealing;
- Without exploiting the people who made them;
- In decent working conditions, and
- Without damaging the environment.

Our standard practice is to request our suppliers to participate in the 'supplier survey' and provide relevant documents, certifications, accreditations and audit reports based on survey response to enable us to assess the risk in relation to modern day slavery and human trafficking before onboarding. In addition, we require our suppliers to sign and return our 'Ethical Sourcing Supplier Condition of Trading and Code of Conduct' document that covers these matters. 90% of our products are covered through this process, which is an acknowledgement from our suppliers and manufacturers on ethical sourcing. As part of our sustainability and ethical procurement roadmap, our target is to cover 100% of suppliers with this process by 2021.

We also have 'supplier visit' programme in place to monitor the activities on ground. We had set an ambitious plan to cover 100% of our key suppliers (80% by spending) who have moderate to high risk rating through this programme by 2026, and then repeat the programme in regular intervals.

## Training

Besides engaging directors and functional leaders, we are providing appropriate training to ensure that relevant employees understand the risks of modern slavery and human trafficking within our business and supply chains. Enrolling into Supply Chain Sustainability School and learning the fundamentals behind combating modern slavery and human trafficking from the resource library are now integral part of our induction programme for new employees.

*Note: This document is reviewed and updated in every six months.*



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Warren Lynes

Managing Director

19/04/2024

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Date