

## Modern Slavery Policy

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking.

### **Introduction**

The company is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

### **Our organisational structure and operations**

The company is a manufacturer / supplier of doors, and Joinery products, working in the construction industry.

### **Nature of our supply chains**

Our Group's key supply chains involve sourcing raw materials and the manufacture of doors, screens and seals from Europe and Asia.

### **Policies relating to slavery and human trafficking**

Our Anti-slavery policy reflects our commitment implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

Our policies have been developed by the Human Resources Department in conjunction with a third party.

### **Risk assessment**

We use the following processes and information/resources to assess which of our own activities and supply chains represent the highest risks in respect of slavery or human trafficking:

- Due diligence questionnaires
- ISO standards & Procedures for Procurement
- FSC Commitment Policy as defined by the International Labour Organisation

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We also seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking.

**Due diligence processes in relation to slavery and human trafficking**

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chains. We aim to undertake the following due diligence processes in relation to current and new suppliers:

- Annual supplier audits
- Extensive new supplier checks

**Staff training**

We will provide training to key staff to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively operate our policies and procedures aimed at mitigating this risk.

We also expect our key suppliers to provide such training to their own staff.

We will make use of our whistleblowing policy for the protection of those who whistle-blow in relation to an issue of modern slavery.

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