

Policy Title	<b>Modern Slavery Policy</b>		
Policy Number	<b>CG-Policy-MS</b>	Effective Date	<b>1/7/2024</b>
Responsible Official	<b>Loren Jenner</b>		

## **Reason for the Policy**

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain.

## **Policy Detail**

### **ORGANISATION STRUCTURE**

Stockists of builders' hardware based in the UK, specialising in supplying the door and window manufacturing trades to the UK and Europe.

### **OUR SUPPLY CHAINS**

Our supply chains include the sourcing of products related to supplying the door and window manufacturing trades to the UK and Europe. A percentage of our products are manufactured for us in countries other than the UK

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business associations 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 <https://www.transparency.org/en/countries/united-kingdom> is used as a guide when appraising new sources of supply.

Suppliers are appraised before acceptance via a company questionnaire.

Where possible we build long standing relationships with suppliers and make clear our expectations of business behaviour. We expect each entity in the supply chain to ensure due diligence on the next link in the chain. It is not practical for us - and every other

participant in the supply chain - to have a direct relationship with all links in the supply chain.

We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. Staff are expected to report concerns and management are expected to act upon them.

## **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 relevant members of staff. All Directors have been briefed on the subject.

## **RESPONSIBILITY**

Ultimate responsibility for the of modern slavery rests with the Company's leadership. The CEO & directors of the Company have overall responsibility for ensuring this policy and its implementation complies with prevailing legal and ethical obligations. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

## **REVIEW AND MONITORING**

Following its initial adoption, this Modern Slavery Policy will be reviewed by the CEO & Directors on a regular basis (at least annually) and may be amended from time to time.