

# Anti-Slavery and Human Trafficking Statement

## Introduction

This statement sets out Eurocell Group’s actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our own business and our supply chains. This statement relates to actions and activities during the current financial year.

We are absolutely committed to preventing slavery and human trafficking in our business activities, and to ensuring that our supply chains are free from slavery and human trafficking.

## Organisation structure, business and supply chains



Eurocell is the UK’s leading manufacturer, distributor and recycler of UPVC products thanks to a combination of precision extrusion capabilities, product innovation and customer service excellence.

The window, door, conservatory and roofline products that have made us the nation’s number one have now been enhanced by an innovative range of interior and outdoor living UPVC products designed to save money, time and energy.

From our headquarters in Derbyshire, we operate a purpose-built 80,000 sq. ft extrusion and tool-making facility, with more than 260,000 sq. ft of stockholding capacity.

We also operate a nationwide network of more than 150+ branches, supplying a complete range of PVC-U roofline, conservatory roof, window trim and door products, as well as all the fixings, sealants and tools required for every building plastics job. Branches are open to both trade and DIY customers. Most of the 4,000 product lines stocked in each depot are manufactured by Eurocell,



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giving us full control over our supply chain so we can deliver consistent service and quality benefits to our customers.

We currently employ over 1000 people across our network.

Our supply chains include the sourcing of both raw materials and ready made products related to the provision of uPVC manufacturing. Our main raw materials are sourced from manufactures in the UK and Europe. Traded goods are directly sourced in the UK, from suppliers who are manufacturing within the UK or Globally.

### **Our Policies on Slavery and Human Trafficking**

We operate the following policies and procedures to identify modern slavery risks and prevent slavery and human trafficking in its operations:

- **Anti-Slavery and Human Trafficking Policy**

We are in the process of rolling out a revised Anti-Slavery and Human Trafficking Policy. Our policy will outline our zero tolerance approach to Modern Slavery of any kind within our operations and supply chain. It will set out the standards we expect of everyone working with us or on our behalf including employees, contractors, suppliers and other business partners and provides guidance on reporting any suspicions or concerns relating to compliance with the Policy.

- **Whistleblowing Policy**

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation.

- **General Principles of Business Conduct**

The company's code makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

- **Supply Chain**

Our supply chains include the sourcing of both raw materials and ready made products related to the provision of uPVC manufacturing. Our main raw materials are sourced from manufacturers who operate mainly in the UK and Europe. Traded goods are directly sourced in the UK, from suppliers who are manufacturing within the UK or Globally.

- Recruitment and use of agency staff

We aim to only use specified, reputable employment agencies to source labour and always verify the practices of any new agency we use before accepting workers from that agency. Eurocell Group ensures that all potential employees have the legal right to work in the UK and that relevant employment legislation is adhered to.

Our policies are reviewed and if necessary, amended regularly to ensure that they continue to meet the Company's legal obligations and reflect best practice.

### **Due Diligence**

During the next 12 months our first tier suppliers will be risk assessed and we will ensure compliance with our revised terms and conditions incorporating the Modern Slavery Act 2015 provisions. New suppliers will automatically be issued with our revised terms and conditions incorporating provisions to help the Group achieve compliance with the Modern Slavery Act 2015 provisions.

We will ensure that our Suppliers are confirming they act ethically and within the law in their use of labour. Where suppliers are unable to demonstrate this standard, we will work with them to identify gaps and implement corrective actions within a reasonable timescale. Failure to comply will result in the termination of the business relationship.

Where possible, we build long standing relationships with local suppliers and make clear our expectations of business behaviour.

We will expect our suppliers to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

The Company Directors are responsible for compliance in their respective departments and for their supplier relationships.

### **Performance Indicators**

We will develop effective measures to ensure our compliance with this Statement and our Anti-Slavery & Human Trafficking Policy. Examples of these may include:

- Use of the Whistleblowing policy and Anti-Slavery and Human Trafficking Policy in relation to Modern Slavery and Human Trafficking.
- Reviews of our recruitment and payroll systems to ensure recruitment practices remain legally compliant.
- Ensure that all relevant staff are trained in relation to the Anti-Slavery and Human Trafficking Policy and the risks involved.
- We will assess and classify the risk of our key suppliers. Where we identify high and medium risk we will conduct an assessment and identify gaps and corrective actions based on responses.



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## Training

During the next 12 months we will endeavour to ensure that relevant areas of the business understand the risks of modern slavery and human trafficking in our supply chains and our business. We will aim to provide training to all relevant members of staff.

A handwritten signature in black ink, appearing to read "Mark Kelly", is positioned above the printed name.

Mark Kelly  
Chief Executive Officer  
Eurocell Group Ltd

Date: 03<sup>rd</sup> May 2017