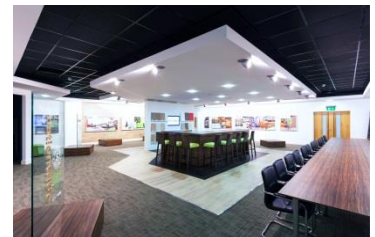


# Our commitment to the Modern Slavery Act

## Financial year ending December 2019



This statement is made in accordance with the UK Modern Slavery Act 2015. It constitutes The Hadleigh Timber Group's slavery and human trafficking statement for the financial year ended 31 December 2019.



This statement covers the activities of Meyer Timber Limited, Panelco Limited, Premium Timber Products Limited and Timbmet Limited.



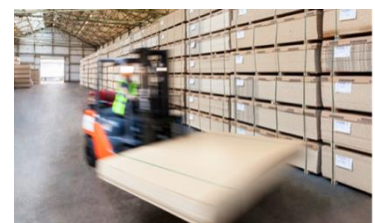
The Hadleigh Timber Group advocate that modern slavery has no place in modern business and takes steps to ensure that to the best of our reasonable knowledge this is not taking place in our operations or supply chains.



This statement has been approved by the Board of Directors for The Hadleigh Timber Group Limited.

A handwritten signature in black ink, appearing to read 'D. Barnett'.

Darren Barnett, Director.





## **Our Business**

We are a group of stand alone warehousing and distribution companies with a focus on our customers and an aspiration to add value throughout our operations.

### **Meyer Timber Ltd**

Holding a product range that extends beyond 7000 panel products and related accessories, sourced from the worlds leading manufacturers. Over the years, we've built our expertise to allow us to offer the extensive product range we have today which is fully supported with a next day delivery guarantee. We operate our own commercial fleet vehicles out of 4 strategically located distribution centres, ideally situated to service customers across the UK.

### **Panelco Ltd**

Stocking all the major manufacturers brands in full range from our warehouse in Stoke on Trent we have a huge scope for stock holding meaning that our customers can rely upon us on all items. This is backed with our in house fleet of 50 vehicles. We have built lasting relationships with our customers during our 20 years of trading enabling us to build relationships based on expertise and trust.

### **Premium Timber Products Ltd**

As a market leader in the sourcing and development of timber and PVCU products we operate in an ever changing and challenging market. Our key to success is the innovation and development of new products supported with dedicated after sales customer services. We make deliveries to over 300 sites every week.

### **Timbmet Ltd**

One of the UK's most extensive timber and panel product stockists, complemented by a range of manufacturing services. We are dedicated to sourcing innovative timber products from around the world, driven by the demands of our customers. We are market leaders in our commitment to the sustainability and legality of our supply base and to responsible business solutions.

## **Group Functions**

To ensure our organisation remains efficient and consistent all businesses are supported by a shared Head Office function covering Finance, HR, Health and Safety, IS and Compliance who drive consistency through the Group.

We have around 520 employees, all of whom are based in the United Kingdom. All of our staff are directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure that our procedures remain robust to the threat of modern slavery.

## **Our Supply Chains**

The Hadleigh Timber Group is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains and to acting ethically and with integrity through out its business.

We use a range of suppliers from those responsible for supplying our product, haulage services and third party staffing sources.

## **Policies on modern slavery**

Hadleigh Timber Group has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include:

- Working with Suppliers and Partners Policy which sets out internal requirements for buying goods and services;
- Responsible Procurement Policy covering issues of human rights, child and forced labour and modern slavery, which Hadleigh Timber Group's suppliers are required to comply with; and
- EUTR briefing statement.
- Responsible Purchaser Compliance Certificate.
- Whistleblowing Policy which encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour.

## **Risk Assessments and Supplier Due Diligence**

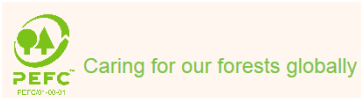
We have a process of supplier audits in place for high risk areas of which labour contracts, working conditions, evidence of child labour and working hours are key components.

As active members of the Timber Trade Federation we actively engage and comply with their sustainability Code of Practice and Responsible Purchasing Policy, our due diligence related to the supply of our products is audited against this standard.

Our HR policies cover all aspects of employment including recruitment and eligibility to work in the UK, employee wellbeing and conduct at work. Where we use external recruitment agencies to provide staff, these agencies are subject to our procurement due diligence process as any other supplier.

We continue to evaluate and analyse our supply chains through a programme of supplier audits. Our direct suppliers are from UK and non UK sources and the majority of products that are imported are done so under the umbrella of PEFC (Programme for the Endorsement of Forest Certification) or FSC (Forest Stewardship Council).

These internally recognised schemes are underpinned by social and ethical standards as part of their core principals.



The PEFC standard sets out compliance requirements in regard to social and health and safety requirements. This commitment is echoed in our own self declaration to support these standards.

The FSC standard means that our suppliers work within 10 principals (<https://ic.fsc.org/the-ten-principles.103.htm>) including the social elements as listed. In support of this the FSC will not associate with organisations that engage in unacceptable practices and each organisation must be subjected to due diligence prior to association with FSC being confirmed.



An important element of any due diligence programme is the ability of employees and others to raise concerns about abuses of labour rights, non-compliance and other issues. We know that effective workplace communication, strong management and grievance procedures are key to making sure that workers' complaints are addressed. All new starters receive an Employee Handbook which summarises our grievance procedure and our Policy Booklet (which contains our whistle blowing and grievance policies) is freely available on our Intranet.

### Measuring Effectiveness

Our supplier audits are ongoing in high risk supply chains, for example we under audits in China at least every 6 months. Additionally we continue to work with supply chain partners on modern slavery issues as part of our supplier engagement. We are externally audited against these standards to ensure our ongoing compliance.

In addition to undertaking trade within the remit of these guidelines we visit timber mills at source and are able to observe standards in the work place. These visits are only undertaken by suitably qualified and trained employees who have experience of working in timber supply chains.

By operating within this external framework we are satisfied that we have taken reasonably practicable steps to ensure the transparency of our supply chain in regard to slavery and human trafficking.

We operate stringent employee checks and are alert of duplicated information such as bank details and addresses that could indicate employees are not freely engaging in employment, additionally we check all original documentation to prove individuals can work in the UK.

## Training for staff

During the year we have continued to deliver training to our employees who have a direct responsibility for relevant supply chains to raise awareness of modern slavery and how to report it if they have concerns.

## Going Forward

Over the coming year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Should a supplier fail to provide information when requested or fail to meet our expectations, we will take appropriate action which may include not entering into a relationship or terminating the relationship with the supplier concerned.

## Awareness

Within our industry we collaborate with the following organisations:

Forest Stewardship Council	<a href="http://www.fsc-uk.org/en-uk">www.fsc-uk.org/en-uk</a>
Programme for the Endorsement of Forest Certification	<a href="http://www.pefc.org">www.pefc.org</a>
Timber Trade Federation	<a href="http://www.ttf.co.uk">www.ttf.co.uk</a>
Timber Research and Development Association	<a href="http://www.trada.co.uk">www.trada.co.uk</a>
Wood for Good	<a href="http://www.woodforgood.com">www.woodforgood.com</a>
Wood Protection Association	<a href="http://www.wood-protection.org">www.wood-protection.org</a>

