

# Modern Slavery Statement

## Overview

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover of above £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The Statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

## What is Modern Slavery?

Modern slavery is an international crime, affecting an estimated 29.8 million slaves around the world. It is a growing global issue that transcends age, gender and ethnicities. It includes victims who have been brought from overseas and vulnerable people in the UK, who are forced to illegally work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

## Our policy

The company is working towards establishing a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation. We will also actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour.

Our values: Collaboration, Leadership, Excellence, Agility, Respect, and Responsibility underpin our culture and how we do business. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, customers and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

## Our structure and supply chains

The Brickability Group is a supplier of bricks, tiles and radiators into the UK construction sector. Turnover for the combined Group is projected to be over £130m in 2019.

We invest in developing long term relationships and identifying third parties that best meet the company's needs; this is particularly important because of the specialist nature of our products (bricks, roof tiles and radiators).

We believe that the risk of modern slavery in third parties with which we have a direct relationship is relatively low as they are all based within Europe and are large companies. We place obligations on

our third parties to take responsibility for controlling their own supply chain, and this is reiterated in our policy on working with third parties and is included in our supplier contracts.

Both the Purchasing Policy and Supplier Code of Conduct will be reviewed annually, and updated as and when deemed appropriate, to ensure they are continually developed and remain fit for purpose.

## Our procedures

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains.

### Employment:

- Robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; contracts of employment and checks to ensure everyone employed is 16 and above.
- Market-related pay and reward, which is reviewed annually.

### Employee training:

We want to help our people to understand more about this growing issue and how to report any suspicions they may have, whether in a business or personal context. We have highlighted the [modernslavery.co.uk](http://modernslavery.co.uk) site to all our employees, which holds useful information on how to recognise different types of slavery, how to spot the signs and provides details of a telephone helpline. We have developed resources and made them available to our people, including summary documents with an overview of the Modern Slavery Act, and links to the [modernslavery.co.uk](http://modernslavery.co.uk) site.

### Reporting knowledge or suspicion of slavery:

We encourage any staff to report any concerns to senior staff or report directly using the [modernslavery.co.uk](http://modernslavery.co.uk) web site.

### Looking forward: key performance indicators

Going forward, we aim to work towards:

- developing an employee training module that will be undertaken by all employees. This training will outline what modern slavery is, how to identify it and what individuals should do if they suspect there are any cases of slavery occurring. Completion of this training will form a compulsory part of our employees' annual review and new starter induction processes.
- developing a procedure to monitor how our suppliers comply with our supplier Code of Conduct.

### Additional Links:

[www.modernslavery.co.uk](http://www.modernslavery.co.uk)