

# Epwin Group

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## Modern Slavery Act Statement

### Financial Year Ended 31<sup>st</sup> December 2018 – Reported 30 June 2019

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Epwin Group Plc and its subsidiary undertakings, including Specialist Building Products Limited and Specialist Building Distribution Limited, (“Epwin” or the “Group”) have taken and will continue to take to address the risk of modern slavery or human trafficking taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

#### **Our business**

Epwin Group is a vertically integrated manufacturer of low maintenance building products, supplying products and services to the Repair, Maintenance and Improvement, (RMI), new build and social housing sectors. The Group is a leading manufacturer of a broad range of PVC, Glass Reinforced Plastic (“GRP”) and Wood Plastic Composite (“WPC”) low maintenance building products and services. The Group’s operations are wholly located within the UK comprising a number of manufacturing and fabrication facilities and trade distribution centres.

Epwin is committed to best corporate practices and ethical values and has a zero-tolerance approach to any form of modern slavery. The Group is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### **Potential risk areas**

The parts of our operations where we consider there is a potential risk of modern slavery are our supply chain, employees and agency workers.

#### *Suppliers*

The Group sources raw materials, components and equipment predominantly from UK suppliers. However, these supplies, or elements of them, may originate from overseas locations that have been identified by the Group as carrying a higher potential risk of modern slavery.

Parts of the Group provide supply and fit services directly to UK customers. In some cases, the installation services are provided by subcontractors. There is a potential risk that the installers provided by the subcontractors could be involved in modern slavery and human trafficking, or that they are paid less than the minimum statutory pay provisions.

#### *Employees*

The Group employs over 2,000 employees. There is a low but potential risk that employees may not have the right to work in the UK or that they are paid less than the minimum statutory pay provisions.

#### *Agency workers*

The Group utilises agency workers within its manufacturing and distribution operations. There is a potential risk that the source of the agency workers could be involved in modern slavery and human trafficking or that they are paid less than the minimum statutory pay provisions.

As the Group only operates in the UK, we manufacture the majority of our own products and source primarily from UK based suppliers, we view our overall risk to be low.

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## **Policies and procedures**

In order to mitigate the risk of modern slavery within the risk areas identified the Group operates a number of policies and practices covering suppliers and recruitment.

The Group undertook the following activities during the year:

1. A Regulatory Compliance Steering Committee has been established that meet regularly to ensure compliance with legislation including Modern Slavery. The role of the Regulatory Compliance Steering Committee is to identify changes in regulation, define strategies to improve governance with regards to regulation, agree actions and monitor progress.
2. The Regulatory Compliance Steering Committee have commenced a Modern Slavery supplier risk assessment process; identifying all suppliers to the Group, stratifying the suppliers according to risk-based criteria and determining appropriate action. During the year all significant suppliers were written to clarifying the Epwin Group policy and expectations to ensure they are aware of and comply with the Modern Slavery Act. Significant suppliers were also requested to complete a Supplier Assessment questionnaire.
3. A preferred list of recruitment agencies for both permanent and temporary staff has been established for the Group.

In the next year, the Group intends to undertake the following:

1. The supplier risk assessment process will be extended across the entire supply chain and reviewed by the Regulatory Compliance Steering Committee. Where further suppliers are deemed significant or higher risk, they will be sent a letter and required to complete a Supplier Assessment questionnaire enquiring about their policies and practices with regards to labour in their own business and supply chain.
2. The responses to the Supplier Assessment questionnaire and outcomes will be tracked on a register with a risk assessment performed on any discrepancies, recording any follow up enquiries or action plans required.
3. Perform Modern Slavery refresher training for senior management and rollout training for those employees responsible for functions where the risk of modern slavery and human trafficking is considered to be higher. Using a train-the-trainer approach, tool-box talks will be used to cascade key points to all roles involved in the appointment of suppliers and the recruitment of employees and agency workers.
4. The preferred list of recruitment agencies and subcontract installers will be required to complete a Supplier Assessment questionnaire enquiring about their labour policies and practices. Responses will be tracked and reviewed along with the remaining supplier base.

## **Approval of this statement**

This statement was approved by the Board of Directors on 28<sup>th</sup> June 2019 and signed on its behalf by:

**Jonathan Bednall**  
**Chief Executive Officer**