

MODERN SLAVERY STATEMENT



WEALDEN WOODSTYLE

CARPENTRY & JOINERY CONTRACTORS

A) ORGANISATION

This statement applies to Wealden Woodstyle Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2018-2019.

B) ORGANISATIONAL STRUCTURE

The Organisation is controlled by 4 shareholding Directors and 1 Operations Director. In addition to the Operations Director, there is also a Contracts Manager and Site Managers controlling the Operatives on site. The Organisation's central office business activities are conducted from the Head Office in Ashford, Kent. There will be varying locations of where sites are based depending on live projects.

The Organisation is primarily a Carpentry/Joinery Contracting company in addition to the installation & maintenance of Fire Doors and small general building operations. The duration for activities on site will vary from project to project.

The labour supplied to the Organisation in pursuance of its operation is carried out wholly in the UK is mainly within the South East of England and within London and Home Counties regions.

C) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK *and in many cases exceeds those minimums in relation to its employees.*

E) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chains include those related to construction supplies. We understand that the Organisation first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

F) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in the supply of labour from Bonafide Subcontractors and Agency workers as checks on rights to work are completed by a third party and are trusted to a declaration statement only.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

G) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

Current Activity:

- We verify that all employees/subcontractors have the right to work in the UK upon commencement of their employment.
- We ask all site operatives to provide evidence of their CSCS cards.
- We make employees/subcontractors aware of their working hours, leave and absence entitlements at induction.
- We aim to only engage Agency workers that are provided by suppliers on our Preferred Supplier list. We require that all Agencies ensure workers have the right to work in the UK , do not charge their workers a work finding fee and have procedures in place to minimise the risk of recruiting forced or compulsory labour.
- We undertake due diligence when considering taking on new suppliers, and are in the process of reviewing our existing suppliers.
- Understanding our supply chain so as to identify and assess particular product or geographical risks of modern slavery and human trafficking.
- Conducting supplier audits – our Supplier Quality Managers work with suppliers in the UK, Europe and in Asia.
- Terminating our relationship with suppliers that fail to improve their performance in line with an action plan or violate our supplier code of conduct.

H) KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- requiring staff to complete training on modern slavery;
- developing a system for supply chain verification; and
- reviewing their existing supply chains.

I) POLICIES

The *Organisation* has the following policies which further define its stance on modern slavery and assists our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:-

- Whistleblowing Policy (that encourages all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature).
- Supplier Code of Conduct which asks that Suppliers will comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Act; not engage in any activity, practice or conduct that would constitute an offence under sections 1,2 or 4 of the Act if such activity, practice or conduct were carried out in the UK; and obtain assurances from the direct subcontractors and suppliers that they are complying with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Act and inform the Organisation in the event that they find any non-compliance within their supply chain.

J) TRAINING

The Organisation provides the following training to staff to effectively implement its stance on modern slavery at *induction training, Webinars, Video*

K) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the *Organisation* obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval.....17.9.18.....

Signed..........

[Insert title] Director

Date.....17.9.18.....