

Epwin Group

Modern Slavery Act Statement

Financial Year Ended 31st December 2017

30 June 2018

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.

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.

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.

Following the training in the previous year, the Group undertook the following activities during the year:

1. Senior management cascaded the key themes of Modern Slavery to their own teams as appropriate.
2. Major suppliers completed a Supplier Assessment questionnaire providing details about how they conduct business including confirming they have a policy that ensures their employees are treated fairly with equal opportunities designed to eliminate victimisation and forced labour. The questionnaire also asks whether they ensure their suppliers have a similar policy.

In the next year, the Group intends to:

1. Perform a risk assessment of all significant suppliers to identify further suppliers that we require to complete the Supplier Assessment questionnaire detailed above. The outcome of all Supplier Assessments will be reviewed by senior members of the procurement team, risk assessed with follow up enquiries and actions put in place as required.
2. All significant suppliers will be written to clarifying the Epwin Group policy and expectations to ensure they comply with the Modern Slavery Act.
3. A preferred list of recruitment agencies for both permanent and temporary staff will be established for the Group. The policies and contracts of the recruitment agencies in relation to Modern Slavery will be reviewed.

Approval of this statement

This statement was approved by the Board of Directors on 21st March 2019 and signed on its behalf by:

Jonathan Bednall
Chief Executive Officer