

Epwin Group

Modern Slavery Act Statement

Financial Year Ended 31st December 2020 – Reported 30th June 2021

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, aluminium, 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 around 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.

The Group undertook the following activities during the year:

1. A review and risk assessment of the recruitment agencies used by the Group was undertaken and a formal process for their appointment was established and implemented.
2. Following the review and risk assessment of recruitment agencies used by the Group a preferred supplier list was established.
3. Following the Modern Slavery training for senior management in 2017, Modern Slavery refresher training was implemented and rolled out to senior management, as well as to other key personnel and new starters.

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

1. Complete modern slavery refresher training for all senior management and key personnel.
2. Extend modern slavery training to those employees responsible for functions where the risk of modern slavery and human trafficking is considered to be higher.
3. Formalise the Modern Slavery Supplier Assessment process and incorporate into the new supplier onboarding procedures (such as tenders) and as part of any future acquisitions.
4. The outcome of all Supplier Assessments will be logged on a register with a risk assessment of any discrepancies and recording any follow up enquiries or action plans required. This will be monitored regularly to ensure responses from suppliers are satisfactory and the risk assessment procedure repeated periodically.
5. Review terms and conditions across the Group and seek to incorporate clauses that provide the Group the ability to audit and take action if issues relating to modern slavery and human trafficking are identified.

Approval of this statement

This statement was approved by the Board of Directors on 23rd June 2021 and signed on its behalf by:

Jonathan Bednall
Chief Executive Officer