

Epwin Group Plc

Modern Slavery Act Statement

Financial Year Ended 31st December 2021 – Reported 30th June 2022

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 Contracting 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 energy efficient, 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”) energy efficient, 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.

Risk areas

The parts of our operations where we consider there is a risk of modern slavery are our supply chain and people.

Supply chain

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 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 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.

Where possible, in particular for our key raw materials, we build long-standing relationships with our core suppliers and communicate with them regularly. This ensures that we understand their business and that they understand our expectations around ethical behaviour. We periodically perform a risk assessment in relation to our key suppliers. We have a robust due diligence process where we do engage with new suppliers, to ensure they meet our high standards of ethical and business conduct, and we seek where possible to incorporate terms and conditions relating to Modern Slavery Act provisions in new supply contracts. A review of key suppliers is part of the due diligence process where acquisitions are made by the Group.

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.

People

The Group employs approximately 2,000 people in the UK. Our employment contracts provide that all our employees must adhere to a code of ethics as set out in our Employee Handbook provided to all employees on joining the Group, with specific policies in relation to anti-harassment and bullying. In addition, all employees are encouraged to report any concerns under our whistle-blowing policy. No

Epwin employees are paid cash in hand. This ensures we minimise the risk of illegal working as well as modern slavery practices.

The Group uses agency workers within its manufacturing and distribution operations. There is a 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. This is the area of our operations where we considered modern slavery risks to be most significant.

Following a review of all recruitment agencies used across the group, which included the completion of questionnaires and some site visits, a preferred supplier list has been established. During the year, we compiled a register with the results of our risk assessment for each supplier, which is monitored regularly to ensure any follow-up enquiries or actions are addressed. Terms and conditions have now been reviewed to ensure they all incorporate clauses that provide the Group the ability to audit and act if issues relating to modern slavery and human trafficking are identified.

Agency spend is reviewed frequently to ensure that, where new agencies are identified, a full risk assessment and due diligence procedures are performed.

As a result of the actions we have taken and controls we have introduced, and considering that we use a limited number of specified, reputable employment agencies to source labour, we view our overall risk in this area to be low.

Training

Modern slavery training was originally mandated to all members of senior management. During the year, refresher training was completed by these employees, and the training extended to other employees responsible for functions where the risk of exposure to modern slavery and human trafficking is considered to be higher. Refresher training will be required on a periodic basis for existing employees, with the register of employees required to complete the training updated frequently to capture new starters and internal promotions.

We will continue to monitor the completion of training by each relevant employee in relation to modern slavery as a key performance indicator in relation to our compliance with Modern Slavery Act provisions.

Conclusion

The Epwin Group is committed to upholding the highest ethical standards. As our business continues to grow, we will continue to review and strengthen our existing safeguards.

Approval of this statement

This statement was approved by the Board of Directors on 28th June 2022 and signed on its behalf by:

Jonathan Bednall
Chief Executive Officer