

Howarth Timber Windows & Doors Ltd
Modern Slavery & Human Trafficking Statement
March 2018:

Modern Slavery & Anti-Human Trafficking Policy and Disclosure Statement

Howarth Timber Windows & Doors Ltd (referred to in this Statement as “HTW&D”), wherever it operates, is committed to conducting business with honesty and integrity; in treating all people with dignity and respect and in complying with applicable laws, regulations and treaties. HTW&D is also committed to protecting and promoting human rights globally. HTW&D does not tolerate child labour, forced labour, including prison labour, or any use of force or other forms of coercion, fraud, deception, abuse of power or other means to achieve control over another person for the purpose of exploitation.

HTW&D respects international principles of human rights including, but not limited to, those expressed in the UN Declaration of Human Rights, United Nations Global Compact Principles, Children's Rights and Business Principles, Women's Empowerment Principles and those principles contained within the UK's Modern Slavery Act 2015.

This statement sets out HTW&D actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of, and supplying to, the construction industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure

HTW&D currently operates one site in England manufacturing high performance, sustainably focused softwood Windows, Doors and Conservatories. Timber & timber products are sourced primarily from the UK, Scandinavia and EU member states within Europe, in line with the HTW&D Environmental Policy Statement which is reviewed and updated by the Board of Directors annually (<https://howarthtimber.thirdlight.com/pf.tlx?OuBObmOmL5UCh>).

The Board of Directors has the overall responsibility for ensuring this policy and disclosure statement and its implementation comply with legal and ethical obligations and managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and disclosure statement and are given the adequate and regular training on it and the issues of modern slavery and human trafficking.

Supply Chain Management & Due Diligence

To identify whether we have sourced products from high risk countries, we have initially identified where the products we are buying are sourced and manufactured; this includes products bought through UK registered wholesalers or direct from overseas suppliers and manufacturers. We are then using the Global Slavery Index 2014, (www.globallslaveryindex.org) to identify products from countries with a Mean Vulnerability of over 45. Currently there are no 'high risk' countries within the HTW&D supply chains.

HTW&D undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chains broadly to assess particular product(s) or geographical risks of modern slavery and human trafficking.
- Ensure all timber suppliers have either PEFC or FSC Chain of Custody certification, which includes a self-assessment declaration that they do not take part in activities which would fall under the Modern Slavery Act in line with the violation of any of the ILO (International Labour Organisation) Core Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work.
- Evaluating the modern slavery and human trafficking risks of each new supplier based on geographical location and reputation of the country the product(s) are manufactured in.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Assessing the risk profile for each supplier.
- Taking steps to improve sub-standard supplier's practices, by encouraging them to put in to place their own Modern Slavery Policy and Disclosure Statement.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking such as the Fortis Group's work on ensuring all suppliers meet the highest ethical standards.

- Where possible, using ethical supplier databases where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Relevant Policies

HTW&D operates the following policies that describe its approach to the identification of modern slavery and human trafficking risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Supplier/Procurement Code of Conduct:** HTW&D is committed to ensuring that its suppliers adhere to the highest standards of ethical behaviour. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. HTW&D works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. During 2017/18, all suppliers will be asked to sign up to the Modern Slavery Act for the 2017/18 supply agreements. Failure to sign up to these or failure of their own supply chain, will result in exclusion from the HTW&D supply chain.
- **Corporate Social Responsibility and Responsible Sourcing policies:** The Company operates well engrained CSR and Sourcing policies which will run in conjunction with the Modern Slavery Policy and Disclosure Statement. It operates alongside its Environmental Policy Statement (<https://howarthtimber.thirdlight.com/pf.tlx?OuBObmOmL5UCh>) which is reviewed and updated by the Board of Directors annually and is complimentary and ensures HTW&D operates to the highest possible standards.
- **Employee Code of Conduct:** The HTW&D code makes clear to employees the actions and behaviour expected of them when representing the organisation. HTW&D strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Whistleblowing Policy:** HTW&D is committed to conducting its business with honesty and integrity, and it expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

HTW&D encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The HTW&D whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Recruitment/Agency Workers Policy:** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Performance Indicators (KPI's)

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015 and as a result, the organisation shall:

- Require all HR staff and all staff working within HTW&D with a responsibility for buying to have completed training on modern slavery and human trafficking.
- Reviewing its systems and procedures for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain.
- Reviewing its existing supply chains whereby the organisation continually evaluates all existing suppliers in line with its Chain of Custody procedures and ongoing annual internal audit schedules on each of its four sites.


Responsibility and Approval

The Board of Directors has the overall responsibility for ensuring this policy and its implementation comply with legal and ethical obligations and managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given the adequate and regular training on it and the issue of modern slavery.

HTES will review, update and publish this Modern Slavery & Anti-Human Trafficking Policy and Disclosure Statement annually.

Chairman: Andrew Howarth

Signature:


6/3/18

Date:

General Manager

Ian Smith

Signature:



Date:

9/5/18