

# Our commitment to the Modern Slavery Act

# Financial year ending December 2023

This statement is made in accordance with the UK Modern Slavery Act 2015. It constitutes The Hadleigh Timber Group's slavery and human trafficking statement for the financial year ended 31 December 2023 and will be reviewed annually.

This statement covers the activities of Meyer Timber Limited, Panelco Limited and Timbmet Limited.

The Hadleigh Timber Group advocate that modern slavery has no place in modern business and takes steps to ensure that to the best of our reasonable knowledge this is not taking place in our operations or supply chains.

This statement has been approved by the Board of Directors for The Hadleigh Timber Group

Limited on 4 January 2024.

Darren Barnett, Director.

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#### **Our Business**

We are a group of stand alone warehousing and distribution companies with a focus on our customers and an aspiration to add value throughout our operations.

#### **Meyer Timber Ltd**

Holding a product range that extends beyond 7000 panel products and related accessories, sourced from the worlds leading manufacturers. Over the years, we've built our expertise to allow us to offer the extensive product range we have today which is fully supported with a next day delivery guarantee. We operate our own commercial fleet vehicles out of 4 strategically located distribution centers, ideally situated to service customers across the UK.

#### Panelco Ltd

With over two decades in the trade, we are proud to still be partnered with the best suppliers in the field, offering untouchable ranges on a next day basis. We are passionate about offering unrivalled service and bringing the most on-trend and innovative wood panels to the market. We have built lasting relationships with our customers enabling us to build relationships based on expertise and trust.

#### **Timbmet Ltd**

One of the UK's most extensive timber and panel product stockists, complemented by a range of manufacturing services. We are dedicated to sourcing innovative timber products from around the world, driven by the demands of our customers. We are market leaders in our commitment to the sustainability and legality of our supply base and to responsible business solutions.

#### **Group Functions**

To ensure our organisation remains efficient and consistent all businesses are supported by a shared Head Office function covering Finance, Health and Safety, HR, IS and Compliance who drive consistency through the Group.

As at the end of 2023 we have around 380 employees, all of whom are based in the United Kingdom. All of our employees are directly employed and are not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure that our procedures remain robust to the threat of modern slavery.



# **Our Supply Chains**

The Hadleigh Timber Group is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains and to acting ethically and with integrity through out its business.

We use a range of suppliers from those responsible for supplying our product, haulage services and third party staffing sources.

# Policies on modern slavery

Hadleigh Timber Group has a number of policies which aim to minimise the risk of modern slavery in our supply chain. These include:

- Whistleblowing Policy which encourages staff to report concerns including any related to modern slavery/trafficking and child or forced labour.
- Working with Suppliers and Partners Policy which sets out internal requirements for buying goods and services;
- Responsible Procurement Policy covering issues of human rights, child and forced labour and modern slavery, which Hadleigh Timber Group's suppliers are required to comply with;
- UKTR briefing statement;

# **Risk Assessments and Supplier Due Diligence**

We have a process of supplier audits in place for high risk areas of which labour contracts, working conditions, evidence of child labour and working hours are key components.

During 2023 we conducted in person supplier visits to China the first time this has been feasible following a long period of pandemic lockdowns in the country.

Our HR policies cover all aspects of employment including recruitment and eligibility to work in the UK, employee wellbeing and conduct at work. Where we use external recruitment agencies to provide staff, these agencies are subject to our procurement due diligence process as any other supplier.

We continue to evaluate and analyse our supply chains through a programme of supplier audits. Our direct suppliers are from UK and non UK sources and the majority of products that are imported are done so under the umbrella of PEFC (Programme for the Endorsement of Forest Certification) or FSC® (Forest Stewardship Council®).

These internally recognised schemes are underpinned by social and ethical standards as part of their core principals.



The PEFC standard sets out compliance requirements in regard to social and health and safety requirements. This commitment is echoed in our own self declaration to support these standards.

The FSC standard means that our suppliers work within 10 principals (<a href="https://ic.fsc.org/the-ten-principles.103.htm">https://ic.fsc.org/the-ten-principles.103.htm</a>) including the social elements as listed. In support of this the FSC will not associate with organisations that engage in unacceptable practices and each organisation must be subjected to due diligence prior to association with FSC being confirmed.

An important element of any due diligence programme is the ability of employees and others to raise concerns about abuses of labour rights, non-compliance and other issues. We know that effective workplace communication, strong management and grievance procedures are key to making sure that workers' complaints are addressed. All new starters receive an Employee Handbook which summarises our grievance procedure and our Policy Booklet (which contains our whistle blowing and grievance policies) is freely available on our Intranet.

# **Measuring Effectiveness**

Our supplier audits are ongoing in high risk supply chains, for example we undertake regular audits in China. Additionally we continue to work with supply chain partners on modern slavery issues as part of our supplier engagement. We are externally audited against these standards to ensure our ongoing compliance.

In addition to undertaking trade within the remit of these guidelines we visit timber mills at source and are able to observe standards in the work place. These visits are only undertaken by suitably qualified and trained employees who have experience of working in timber supply chains.

By operating within this external framework we are satisfied that we have taken reasonably practicable steps to ensure the transparency of our supply chain in regard to slavery and human trafficking.

We operate stringent employee checks and are alert of duplicated information such as bank details and addresses that could indicate employees are not freely engaging in employment, additionally we check all original documentation to prove individuals can work in the UK.



# **Training for staff**

During the year we have continued to deliver training to our employees who have a direct responsibility for relevant supply chains to raise awareness of modern slavery and how to report it if they have concerns.

#### **Going Forward**

Over the coming year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

In the unlikely event that modern slavery was discovered within our supply chain or group of companies we understand that it is appropriate that we try to improve and affect positive change in this situation.

We would aim to set out appropriate action plans to identify and resolve the problem by taking the following steps:

- targeting non-compliant factories
- undertaking follow-up visits and site meetings with unions
- committing to help those individuals who have been exploited or enslaved for example by returning confiscated identification papers and compensating unpaid workers
- working with organisations such as Hope for Justice, Modern Slavery and Exploitation Helpline and the Police to provide support to affected workers.

Should a supplier to fail to provide information when requested or fail to meet our expectations, we will take appropriate action which may include not entering into a relationship or terminating the relationship with the supplier concerned.

#### **Awareness**

Within our industry we collaborate with the following organisations:

Forest Stewardship Council
Programme for the Endorsement of Forest Certification
Timber Trade Federation
Timber Research and Development Association
Wood for Good
Wood Protection Association

www.fsc-uk.org/en-uk www.pefc.org www.ttf.co.uk www.trada.co.uk www.woodforgood.com www.wood-protection.org