

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

We are committed to improving our practices to combat slavery and human trafficking.

ORGANISATION'S STRUCTURE

We are a Distributor of Building Materials in the Construction sector. We are a part of the EH Smith Group, and our head office is in the UK. The Group has over 500 employees and operates in the UK only.

OUR BUSINESS

Our business is organised into 6 business units:

- EH Smith (Builders Merchants) Limited
- Northcot Brick Limited
- EH Smith (Specialist Facades) Limited
- Advanced Construction Systems
- EH Smith (Westhaven) Limited
- Avery Estates Limited

RESPONSIBILITY

The EH Smith Board of Directors are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

COMMITMENT AND OUR POLICY

We recognise that we have a responsibility to play a critical role in increasing awareness and taking what positive action we can to prevent any potential slavery:

- We conduct thorough Right to Work in the UK Checks.
- Employee training; ensuring policies/procedures and induction training are implemented and advocated.
- Ensuring remuneration, reward and benefit schemes comply with UK employment legislation.
- Continually review and develop our policies and procedures to ensure ethical and legal compliance.
- Encourage our employees to communicate and report any concerns or suspected breaches whilst ensuring confidentiality.

COMMUNICATION AND AWARENESS

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we communicate directly with our supply chain partners by:

- Identifying potential risk areas in our supply chains.
- Regularly monitoring potential risk areas in our supply chains.
- Protecting whistle blowers (through our Whistleblowing policy).

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values we include our policy with all supply chain agreements.

EH Smith is a member of the Fortis buying group and consequently the majority of all purchases are made through approved Fortis suppliers. Fortis have their own Supplier Code of conduct which involves carrying out a due diligence program with the aim of ensuring all approved suppliers operate in compliance with the Modern Slavery Act.

Our compliance team consists of involvement from the following departments:

- Human Resources and Legal Advice.
- Procurement.
- Sales.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30th June 2018.



Mark Faulkner
HR Director

Date: 28th March 2019