

Epwin Group

Modern Slavery Act Statement

Financial Year Ended 31st December 2019 – Reported 18th December 2020

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 over 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. The Regulatory Compliance Steering Committee met on two occasions in order to establish objectives for the coming year and ensure progress was made against established objectives.
2. The Regulatory Compliance Steering Committee completed its Modern Slavery supplier risk assessment process; identifying all suppliers to the Group, stratifying the suppliers according to risk-based criteria and determining appropriate action.
3. The supplier risk assessment process identified that recruitment agencies represented a higher risk of Modern Slavery to the Group. Following an audit of the appointment process and the current recruitment agencies used across the Group, it was determined that the process should be formalized and more consistent. Following this, a retender process has commenced to establish a preferred supplier list for recruitment agencies.

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

1. Establish and implement a new process for the appointment of recruitment agencies.
2. Establish the preferred supplier list of recruitment agencies to be used by the Group.
3. Finalise the Supplier Assessment process with those newly identified suppliers that have been deemed significant and define risk based criteria to incorporate the Supplier Assessment process into new supplier onboarding procedures (such as tenders) and as part of any future acquisitions.
4. The outcome of all the 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 every three years.
5. Rollout a modern slavery training refresher for senior management. Extend the training to those employees responsible for functions where the risk of modern slavery and human trafficking is considered to be higher.
6. Review terms and conditions across the Group to incorporate matters that gives us the power to take action to the extent the issues relating to modern slavery and human trafficking arise. These will then be communicated to suppliers.

Approval of this statement

This statement was approved by the Board of Directors on 18th December 2020 and signed on its behalf by:

Jonathan Bednall
Chief Executive Officer