



## **BSW Timber Group** **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This is BSW Timber Group's (the 'Company') statement on slavery and human trafficking and is made pursuant to section 54(6) of the Modern Slavery Act 2015 (the 'Act'). It sets out BSW Timber Group's actions to understand all potential modern slavery risks relating 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. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

### **Our Business and Supply Chains**

The BSW Timber Group's principal activities are in domestic timber sawmilling and forestry harvesting and management. This statement is published on behalf of all of the BSW companies and approved by the boards of individual subsidiaries as a board minute. An Organisation Chart is shown at the end of this statement.

Almost two thirds of the Group's £350M turnover and over 80% of its 1,300 employees are represented by BSW Sawmills, operating across seven UK manufacturing locations. The company also owns and controls Tilhill Forestry timber harvesting and marketing and BSW Latvia SA which is a single site sawmill in Riga. We also have an interest in Alvic Plastics Ltd who are manufacturers of composite decking.

BSW Timber Group sources its timber products from sustainable sources in accordance with its Timber purchasing policy and in line with their certified chain of custody scheme Forest Stewardship Council® Certificate number SA-COC-004821 FSC-C023225.

As part of our on-going drive to meet our business values and standards, we continue to monitor and assess our suppliers. At the same time, to continually seek to enhance supplier standards, we are reducing and rationalising our supplier base which enables us to have fewer and stronger supplier partnerships, which in turn enables us to have a greater knowledge of our business partners and control ensure enhanced supplier standards.

### **Relevant Policies**

The BSW Group Operational Board of Directors has responsibility for anti-slavery for Initiatives within its own business, its subsidiaries and supply chains which includes the implementation of policies, risk assessments, investigations, due diligence and training.

In keeping with our commitment to act with integrity in all our business dealings, many of our existing policies are relevant to ensure that there is no slavery or human trafficking in any part of our business or our supply chains. These include:-

- Corporate Social Responsibility Policy
- Purchasing Policy & Supplier and New Supplier Approval and Evaluation Procedure
- Supplier Code of Conduct
- Whistle Blowing Policy
- Bribery Prevention Policy
- BSW Grievance Policy

## **Risk Assessments / Due Diligence**

The risk of slavery and human trafficking within the BSW Timber Group is substantially avoided as a result of strict recruitment processes, policies and procedures. We assess using a risk-based approach considering factors including geographical risk pertaining to human rights as well as the level of supply chain controls.

We consider that the greatest level of risk is in our supply chain where we undertake due diligence when taking on new suppliers, and continue to regularly review our existing suppliers.

Timber suppliers are assessed as part of the evaluation of wood harvested in violation of traditional and civil rights which includes violation of any of the ILO Core Conventions, as defined in ILO Declaration on Fundamental Principles and Rights at Work, 1998. I.E. freedom of association and collective bargaining, elimination of forced and compulsory labour, elimination of discrimination in respect of employment and occupation and abolition of child labour.

The Company's due diligence and reviews include the following:-

- Map the supply chain broadly to assess particular product, sector or geographical risks of modern slavery and human trafficking
- Evaluate the modern slavery and human trafficking risks of each new supplier
- Strive to monitor and improve supply chain transparency on a continuous basis
- Engage with suppliers to provide advice, support and remediation if necessary to implement improvement plans and manage risk if required

## **Effectiveness and Performance Review**

Our key performance indicators are the number of approved suppliers, the number of employees trained on modern slavery and human rights. The number of cases or incidents highlighted or brought to our attention in our supply chain.

During 2018/19, the Company can report that there has been no recorded incidences of modern slavery across our business or our supply chain. However, we are not complacent and will continue to develop our systems to ensure we mitigate any risk across our business.

## **Training**

Modern Slavery is included as part of our induction training process.

The Company requires staff working across the business as senior managers / supply chain managers/HR professionals to participate in training sessions which cover:-

- Our purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the business
- What external help is available, for example through the Modern Slavery Helpline, Gang Masters Licensing Authority
- Remediation for affected workers or those at risk should any instances be identified

### Further Steps

During 2019/20, BSW Timber Group will build on the work we have achieved this year and continue to develop our approach to the risks of modern slavery including a new group training system within areas of our business operations.

### Board Approval

This statement has been approved by the Company's Board of Directors, who will review and update it annually.

Chief Executive Officer's Signature: *Tony Hackney*  
Chief Executive Officer's Name: *TONY HACKNEY*  
Date: *12th September 2019*



### BSW Group: Corporate Structure 2019



