

Modern Slavery Policy 2021

To act in accordance with the Modern Slavery Act 2015 we have set-out the steps we take to safeguard our employees and supply chains from Modern Slavery. The structure of this statement follows section 5.2 of the Transparency in Supply Chains etc. A Practical Guide.

The Joseph Parr Group operates in the United Kingdom and is made up of six builders' merchants based at twelve locations. The Group buys and sells building materials and delivers these to their customers within the United Kingdom.

This statement of commitment applies to all subsidiaries and has been signed by Directors to demonstrate Senior Management support of this policy.

Within this document we shall address key issues surrounding Modern Slavery, addressing our commitments in turn. We shall take all reasonable and practicable steps to protect individuals and groups from Modern Slavery.

Forced Labour and Personal Freedom

We shall never at any time subject any person to forced labour. Similarly, we shall never imprison our employees or physically confine them. Our employees have the right to end their contract of employment with us at any time. We do not tolerate human trafficking within our business or supply chain.

Contracts of Employment

All of our employees have written contracts stating a clear outline of their rights and responsibilities, there is no deviation from this. Our employees are all treated fairly and equally. We employ only individuals who have a right to work in the UK, either as residents of the UK or in accordance with the correct legal visa status. We do not change contracts of employment without consultation with our employees.

When processing job applications we may need to see personal documents. Once these have been processed and copied (with the permission of the individual) we shall return these. We will never confiscate personal belongings or documents.

Training - Supply Chain Management

Our managers sign a code of conduct to show their commitment to this policy. Our code of conduct has been based on the guidance from the Walk Free Foundation.

Training - All Staff

We shall issue guidance to all staff based on The Ethical Trading Initiative (ETI) Base Code, which has been identified by the UK Government as a reliable source of information. This will form part of our Corporate Social Responsibility (CSR) training.

Employee Treatment & Grievance Procedure

Our employees are treated with dignity and we comply with all health and safety regulations to help create a positive environment. Our employees would never be treated inhumanely and the use of harassment, sexual or physical violence or intimidation against any member of staff would be reported to senior management and or the police for investigation.

We have a documented grievance procedure which applies to all locations. Upon acceptance of the employment offer all employees are issued with a staff handbook which contains information on grievance procedures.



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Salary / Wages and Benefits

All employees are paid the minimum wage or above and any legally required benefits or entitlements. All employees are paid as per the contract of employment and the details of employee wages is confidential and would only be shared with the employee directly or their named next of kin.

We shall not delay or withhold monies due to our employees without advance notice and an explanation of the deduction. All employees are taxed in accordance with the legislation of the UK. Any person involved in employee wages shall be transparent with all information regarding deductions, deception for personal gain is forbidden and would result in gross misconduct.

Working Hours

Workers will be permitted to work in accordance with UK and EU legislation (Including; EU driving legislation still currently applies to HGV drivers until the conclusion of our exit from the European Union). Overtime shall not be forced upon employees and, where possible, overtime and weekend working shall be agreed at the time of employment.

Agency and Recruitment Companies

The Joseph Parr Group and subsidiaries employ directly whenever possible. (Some sites do not invite agency or recruitment companies to assist with employment opportunities.) When our sites do use external companies to help fill vacancies we only use trusted and reputable companies.

Employees who are recruited will not be held accountable for paying fees or costs for the agency or recruitment company. Similarly, employees recruited from overseas will also not be accountable for any company cost incurred in processing travel documents or visa information. Applicants please note that neither we, nor any agency working on our behalf, would ever ask for any money or deposit from you to secure a position within our company.

Reporting and Non-conformance

While we are not aware of any instance of modern slavery in our supply chain we will continue to be vigilant and address any concerns raised to us. We shall conduct an audit of our suppliers internally regularly and if we find that any company does not comply with relevant legislation we shall source our goods with alternative suppliers. We have a zero tolerance approach to non-conformity within our supply chain.

We have a whistleblowing policy in operation and we would take all allegations of harm or wrongdoing against any person very seriously.

Auditing

Our supplier review shall be carried out annually and at this time we shall review our approach to Modern Slavery, this will depend on any reports of non-conformance or concerns relating to the topics stated within this policy statement. Our review will also include any press coverage which concerns our supply chain.

If any Suppliers are deemed to be of higher risk in the first instance we will request their Modern Slavery statement and any information regarding instances of Modern Slavery.

Use of Key Performance Indicators

At this time, with no known instance of Modern Slavery reported we do not feel it is relevant to include Key Performance Indicators. However, we can provide our supplier assessment for review if this is required.



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Detail of Supplier Assessments Overview.

An assessment of our suppliers will be undertaken, this will be based on 'live' suppliers, trading within the previous six-months. We have then applied a trading limit of £50,000 or over to identify our main suppliers by turnover within the group.

These are then checked by product with the main areas of concern being:

- Indian sandstone and natural paving from outside the EU.
- Wood Products from China.
- Hardwoods from South America.
- Clothing, primary risk from Asia.
- Organisations with negative reputations.

We are aware that supplies of personal protective equipment (PPE) are currently identified as a possible area of concern due to the ongoing Coronavirus pandemic. This has been highlighted by the ETI. We will do all we can to ensure legally sourced PPE for our customers and employees.

Management

Our management teams have good moral standing and trade ethically, the support of our managers is critical to the implementation of this policy. By signing below you agreed to act with integrity and support our Modern Slavery Statement.

Hara **Christine Jones Dave Anderson** Signed on behalf of Joseph Parr Group Signed on behalf of Joseph Parr (Middlesbrough) Limited JNBluen). E. Hiph James Hipkins Garry Bluer Signed on behalf of Signed on behalf of Joseph Parr Limited W. & H.S. Emery Company Limited N' Boami Liam Lee Michael Beaumont Signed on behalf of Signed on behalf of Joseph Parr (Alco) Limited Joseph Parr (Alco) Bradford Limited **Ross Murray Keith Slater** Signed on behalf of Signed on behalf of Parr Rochdale Limited The Builders Supply Company Limited

References:

- Our listing: <u>https://tiscreport.org/company/gb/00119432</u> [Accessed 26th January 2021].
- UK Government. 2020. Transparency in Supply Chains etc. A practical guide 2017. [ONLINE] Available

at: <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/</u> <u>file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf</u>. **[Accessed 26th January 2021].**

- Walk Free Foundation. 2014. TACKLING MODERN SLAVERY IN SUPPLY CHAINS A Guide 1.0. [ONLINE] Available at: <u>https://www.walkfreefoundation.org/news/resource/tackling-modern-slavery-in-supply-chains-a-guide-1-0/</u>. [Accessed 26th January 2021].
- The Ashridge Centre & The Ethical Trading Initiative (ETI). 2015. Corporate approaches to addressing modern slavery in supply chains: A snapshot of current practice. ISBN: 978-1-910025-16-1
- UK Government. 2015. The Modern Slavery Act 2015. [ONLINE] Available at: <u>http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted</u>. [Accessed 26th January 2021].
- Price Waterhouse Coopers LLP. 2015. The Modern Slavery Act How should businesses respond?. [ONLINE] Available at: <u>https://www.pwc.co.uk/assets/pdf/msa-updated-briefing-document.pdf</u>. [Accessed 26th January 2021].
- UK Government. 2020. Modern Slavery. [ONLINE] Available at: <u>https://www.gov.uk/government/collections/modern-slavery</u>. [Accessed 26th January 2021].
- The Ethical Trading Initiative (ETI). 2014. The ETI Base Code. [ONLINE] Available at: <u>https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_english.pdf</u>. [Accessed 26th January 2021].
- The Ethical Trading Initiative (ETI). 2018. Posters. [ONLINE] Available at: <u>https://www.ethicaltrade.org/resources/eti-base-code-poster</u>. [Accessed 26th January 2021].
- The Ethical Trading Initiative (ETI). 2016. Human rights due diligence framework. [ONLINE] Available at: <u>https://www.ethicaltrade.org/resources/human-rights-due-diligence-framework</u>. [Accessed 26th January 2021].
- The Ethical Trading Initiative (ETI). 2016. Human rights due diligence framework Exec Summary. [ONLINE] Available

at: <u>https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_human_rights_due_dilige_nce_framework_exec_summary.pdf</u>. [Accessed 26th January 2021].