

MODERN SLAVERY STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31st December 2020.

About us and our Supply Chain

Staircraft Group are a market leading building product manufacturer supplying UK wide.

Staircraft Group are committed to working collaboratively with our supply chain and customers to conduct our business ethically and in compliance with applicable law. Our key supply chains include the procurement of timber, timber fibre products, and manufacturing consumables, sourced globally, which are used in our manufacturing process. We deliver products direct to customers via our own distribution channels.

Policies and control on Modern Slavery

Staircraft Group strongly believe in fair and ethical working practices and are opposed to all forms of unethical business behaviour. We recognise the harmful impact that modern slavery and human trafficking has on individuals and society and we are committed to help prevent these illegal practices.

This principle is enshrined in our policies which every employee of Staircraft Group must adhere to and reflect our commitment to implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices. In addition, via our Whistleblowing Policy we encourage our employees to report concerns without fear of recrimination. We act ethically and with integrity in all our business activities and relationships.

We are committed to being a responsible business and continually strive to work with suppliers who share the same values.

Internally - our approach is intended to be effective and pragmatic:

- Understand: through training and resources provided
- Question: do not ignore suspicions, both internally when dealing with fellow employees or third-party service providers, or externally when dealing with suppliers. If you are concerned, report it.
- Report: any remaining concerns should be reported immediately to the Human Resources department. Your concern will be dealt with professionally and in strict confidence.

Due diligence and supplier performance

Our centrally controlled suppliers go through a due diligence process, which includes an assessment of compliance with our values through a Supplier and Contractor Questionnaire. The Supplier and Contractor Questionnaire includes but is not limited to Business Ethics, Labour, and Human Rights.

Based on the results, our Commercial Team may contact them to request further documentary evidence or undertake additional tasks to demonstrate compliance or mitigate risk.

Our key suppliers will undergo quality audits (which may include physical inspections). These processes are documented and are designed to assist in the identification of potential slavery and human trafficking.

Prior to trading, all new suppliers must satisfactorily complete pre contractual checks to ensure that we only trade with suppliers whose values are aligned to our own.

This assessment forms our minimum expectation around supplier due diligence and work is ongoing to bring all suppliers under this framework.

Additionally, 100% of timber and timber fibre products purchased by Staircraft Group are certified as responsibly sourced (FSC or PEFC). Both the FSC and PEFC certification schemes require compliance with the ILO Declaration on Fundamental Principles and Rights at Work, 1998, prohibiting the use of forced or child labour.

Internally we verify the identity and right to work of every employee by inspecting original passports and visas to ensure that there are no potentially vulnerable employees. We only use agencies that have been verified through our internal due diligence processes.

Any concerns arising from the above processes are escalated to a senior level.

Progress this year and looking ahead

Having reviewed and revised our statement and procedures including the Whistleblowing Policy, these are assessed as fit for purpose.

Internally we are ensuring all staff continue to receive training on this matter and we are also including this training in the new starter inductions going forward.

We are also enhancing our supplier auditing process, we have invested in and centralised this process to support our commitment to effectively monitor our suppliers with questionnaires and necessary due diligence according to requirements, which will allow for us to further underline the emphasis we place on ethics and sustainability.

Reviewing, managing and internally auditing our processes and files to ensure we remain compliant will be our priority and commitment for the forthcoming year.

We will continue to develop our approach, review our progress and publish an updated statement annually. This statement is approved by the Board of Staircraft Group in relation to the financial period ending 31st December 2020.

Andy Hamilton

Managing Director

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