

Smith Brothers (Leicester) Ltd

Modern Slavery Act Statement

This statement is made on behalf of Smith Brothers (Leicester) Ltd, pursuant to section 54 of the Modern Slavery Act 2015. This document outlines the steps the company Smith Brothers (Leicester) Ltd has taken and is continuing to take to ensure that modern slavery, or human trafficking is not taking place within our businesses or supply chain.

Modern Slavery encompasses slavery, servitude, human tracking and forced labour. Smith Brothers (Leicester) Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings. We aim to put effective systems and controls in place to safeguard against any forms of modern slavery taking place within our business or our supply chain.

Business and Structure

Smith Brothers (Leicester) Ltd is a group of companies including wholesale, product manufacturing, product installation, and management of property and investment portfolios. Our Head Office is based at 295 Aylestone Road, Leicestershire.

High-Risk Areas

A potential high-risk area for Smith Brothers (Leicester) Ltd is our subsidiaries international suppliers. We require that they establish in their initial negotiations, with any national or international supplier, the products we source have originated from a manufacturing process that respects all aspects of the modern slavery act.

Policies

We operate a number of internal policies to ensure we are conducting our business in an ethical and transparent manner. These policies include:

1. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring this does not take place in our supply chains.
2. Our anti-slavery policy reflects our aim to act transparently, respectfully and with integrity in all our business relationships. We implement and enforce effective systems and controls to mitigate this risk.
3. We have reviewed our purchases to understand the nature of our suppliers. These include freelancers, consultants and companies providing a wide range of goods and services to help us deliver our aims and objectives.
4. We have in place systems to mitigate the risk of slavery and human trafficking occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. We assess

the risk of slavery or human trafficking occurring in our supply chains and apply enhanced checks where higher-risk areas are identified.

5. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide updates to our staff via internal newsletters/briefings and by providing both written and oral reminders of good practice.
6. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.


Performance Indicators.

We will know the effectiveness of the steps taken by Smith Brothers (Leicester) Ltd to ensure slavery or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public or any law enforcement agencies to indicate that modern slavery practices have been identified.

This statement constitutes the parent company's modern slavery and human trafficking statement for the financial year ending 30th September 2018. Where required subsidiary companies will publish a variant applicable to their operation.

This document has been signed on behalf of the company's Board of Directors by:



Martin Forbes Heatlie
Chief Executive Officer (Joint)