

## **Taylor Maxwell Timber Ltd**

### **Slavery and human trafficking statement for the year ending 31 March 2020**

This is the Modern Slavery and Human Trafficking Statement of Taylor Maxwell Timber Ltd (**Taylor Maxwell**). This statement is made pursuant to section 54(l) of the UK Modern Slavery Act 2015 (the 'Act'). In accordance with the Act this statement is published on the Taylor Maxwell website [www.tmttimber.co.uk](http://www.tmttimber.co.uk) and others and will be reviewed, updated and published annually.

#### **Declaration:**

Taylor Maxwell hereby confirms that it does not support or deal with any business that it knows or suspects to be involved in slavery or human trafficking. Our business operations and supply chains are free from slavery and human trafficking and Taylor Maxwell will continue to develop our systems to ensure this continues in the future.

#### **1. Our structure, business and supply chains**

Taylor Maxwell offer a year-round supply of timber from some of the world's best sawmills for a wide range of commercial uses.

We distribute our products from sawmills and from stock directly to our customers.

Our business is not seasonal, and we employ no seasonal staff. Minimal use is made of agency staff to cover sickness and maternity leave only.

In the year ending 31 March 2020, our turnover was £98 million and over 98% of the timber goods we purchased came from EU suppliers. Less than 2% of our purchases come from outside the EU and are subject to EU Timber Regulation (EUTR). We recognise that some of these countries may present an increased risk of modern slavery in their supply chains.

## **2. Our Modern Slavery Policy**

Attached at Appendix 1.

## **3. Our Due Diligence Process in relation to Slavery and Human Trafficking**

Wherever possible we source timber through Chain of Custody (COC) certification schemes such as FSC and PEFC which have strict requirements upon the protection of forced labour within any accredited organisations. Both these schemes refer to the 1998 International Labour Organisation (ILO) Fundamental Principles and Rights at Work declaration.

Taylor Maxwell is a member of the Timber Trades Federation (TTF) and is audited annually to comply with the TTF Responsible Purchasing Policy (RPP). If the only available source of supply is a company lacking COC certification, we adhere to the RPP which has requirements prohibiting the use of compulsory or forced labour and requires adherence to national labour laws as defined under the EUTR.

The RPP Guide Appendix 1 "Details of applicable legislation" refers to the need to mitigate against the risk of not adhering to relevant employment laws in countries of harvest. It specifically refers to the observance of "legislation against forced and compulsory labour".

## **4. The Parts of the business and Supply Chain where there is a risk of slavery and human trafficking taking place**

Taylor Maxwell will assess all current and new suppliers for risks of modern slavery and human trafficking. We recognise that some countries outside the EU and certain products may present an increased risk of modern slavery in their supply chains. Where a potential risk is identified, Taylor Maxwell will conduct due diligence to map the supply chain.

## **5. Effectiveness of our policies and procedures**

Where our suppliers are required to publish a Modern Slavery Statement, we have obtained a copy of this from their website and recorded compliance on our records.

We previously asked identified high-risk suppliers to adhere to our Supplier Code of Conduct. Going forwards, we will issue our revised attached Supplier Code of Conduct to all our suppliers in addition to any non-EU suppliers where there is not a published Modern

Slavery Statement and Policy on the Suppliers website. This will be resent every 2 years and signed agreement will be obtained.

## 6. Staff training and awareness

All staff are aware of our Modern Slavery Policy and this is available on our company intranet. All new staff are asked to read and confirm their understanding of this policy upon joining the business.

It is our intention to provide further training, particularly to those staff involved in supply chain procurement, in the coming financial year.

This Statement was approved by the board of directors and signed on their behalf by:

Name: MARK PHILLIPS Position: GROUP FINANCIAL DIRECTOR  
Signature:  Date: 8 OCTOBER 2020

**Taylor Maxwell Group (2017) Ltd****Modern day slavery and human trafficking policy**

*Last updated: August 2020*

**Aims and objectives**

Modern Day Slavery can be defined as situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, abuse of power or deception.

Taylor Maxwell Group (2017) Limited is committed to driving out acts of modern-day slavery and human trafficking within its business including sub-contractors and agents and from within its supply chains.

The Group acknowledges its responsibility under the Modern Slavery Act 2015 and will ensure transparency within the Group and within suppliers of goods and services to the Group.

The Group will not support or deal with any business that it knows or suspects to be involved in slavery or human trafficking.

The Directors of Group operating companies shall take responsibility for implementing this policy statement

As part of the Group's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by those suppliers considered to be high risk.

For all suppliers that are not required to publish a slavery statement, we ask that they confirm agreement with our Supplier Code of Conduct. This agreement is requested for all new suppliers and every 2 years thereafter.

Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The Directors of Group operating companies involved with such imports shall provide adequate management control and on-going monitoring to ensure that slavery and human trafficking is not taking place within these supply sources.

Any breach of this policy may lead to disciplinary action which in serious cases would include dismissal under our Disciplinary Policy.

The latest version of this policy is available on the Group intranet.

**M A Phillips**

Group Financial Director

September 2020

This policy applies to Taylor Maxwell Group (2017) Ltd & its subsidiaries, which include the following:

Taylor Maxwell & Co Ltd

Taylor Maxwell Timber Ltd

Vobster Cast Stone Co Ltd

Taylor Maxwell Holdings Ltd

Taylor Maxwell Group Ltd

**Taylor Maxwell Group (2017) Ltd****Supplier Code of Conduct**

Taylor Maxwell Group (2017) Limited ("Taylor Maxwell", "we", "our" or "us") are aware of our responsibility toward our customers, employees and the community and expect all companies who do business with us to adhere to our supplier code of conduct.

It is the policy of Taylor Maxwell & Co Ltd to formally request that all our suppliers respect the principles of this Supplier Code of Conduct and adopt practices that are consistent with it.

**Laws, ethical standards and Human Rights**

The supplier shall comply with all laws applicable to its business.

The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice. In particular:

**Child labour**

Suppliers must follow the ILO recommendations of minimum age for employment and not use child labour in any part of their business.

**Working Conditions**

Workers must have safe and healthy working conditions that meet or exceed applicable standards.

Payment and benefits must comply with any agreements relating to minimum wages and overtime payments.

Workers must be allowed the right of freedom of association and to collective bargaining subject to local laws.

### **Human trafficking, including forced labour or indenture labour**

The supplier must not make use of forced or compulsory labour, nor violate or impact on the human rights of others.

Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws under which with they operate.

### **Compensation and working hours**

The supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.

### **Discrimination**

Suppliers are expected to treat all people equally with respect and dignity and create equal opportunity to employees and applicants without discrimination.

Suppliers must not discriminate on the basis of race, religion, disability, age, marriage, sexual orientation, gender, pregnancy and maternity or gender reassignment.

### **Bullying and Harassment**

Suppliers must ensure their employees are afforded an environment free from physical, psychological and verbal harassment, or other abusive conduct.

### **Health and safety**

Suppliers shall comply with all applicable environmental, health and workplace safety laws and regulations.

Suppliers must provide a work environment that is safe to preserve the health of employees, and prevent accidents, injuries and work-related illnesses.

### **Business continuity planning**

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness). This includes disaster plans to protect both employees and the environment as far as possible from the effects of potential disasters.

### **Improper payments/bribery**

The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the supplier may not offer services, gifts or benefits of employees in order to influence the employee's conduct in representing us.

### **Anti-Corruption Laws**

Suppliers must comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business.

### **Competition and Anti-Trust**

Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Suppliers must refrain from participating in a cartel.

### **Environment**

The supplier shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment. We expect our suppliers to take climate protection appropriately into account in their own operations.

### **Whistleblowing Protection**

Suppliers are expected to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers are also expected to act to prevent, detect, and correct any actions

### **Information Security**

Suppliers must protect the confidential information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures.

Suppliers must comply with applicable data privacy laws.

### **Business partner dialogue**

The supplier shall communicate these principles to its direct suppliers and shall verify that they adhere to this Code of Conduct



Any breach of the obligations stipulated in this supplier code of conduct is considered a material breach of contract by the supplier.

Company Name: \_\_\_\_\_

If the above-named company or business has an annual turnover equal or in excess of £36 million or over, please attach your published Modern Slavery Act statement of compliance to this form or provide a web address to your website where it may be found:

I confirm that \_\_\_\_\_ (insert company name)

Conducts its business activities in compliance with the Modern Slavery Act 2015 and seeks to ensure act of modern slavery, human trafficking, exploitation of workers and use of child labour are not present in our business supply chain.

Accepted by:  
(Name) \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_