

MODERN SLAVERY ACT

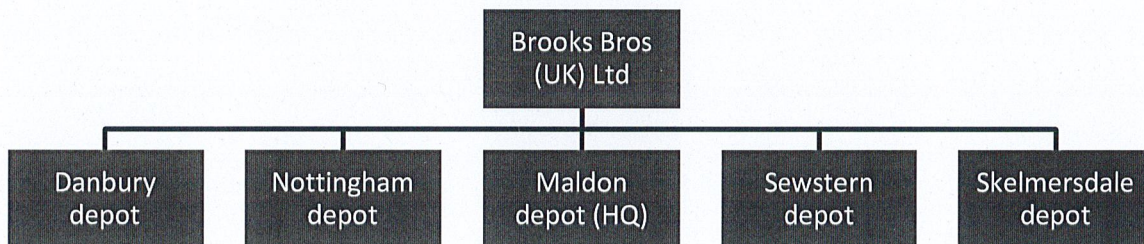
2018 statement

Our business

Over the last 50 years, Brooks Bros (UK) Ltd has evolved from a timber importer on the river Thames to one of the UK's leading privately owned timber companies; trading, manufacturing and distributing timber and timber products across the UK.

Operating from five flourishing depots, four of which have either primary or secondary processing facilities, our annual combined turnover is now approximately £60 million.

Destined primarily for the construction trade and end-user, products traded include hardwoods, softwoods, flooring, decking, cladding and machined timber.



Our people

The business employs around 300 staff, primarily recruiting staff directly, but from time-to-time recruiters are used to hire temporary or permanent staff.

We are committed to conducting our business responsibly, in accordance with applicable UK laws and regulations. We have established HR procedures to ensure:

- employees are assessed for their right to work in the UK;
- staff pay and benefits packages comply with relevant UK legislation;
- work contracts clearly stipulate key employment terms, including salary, working hours, holiday entitlement, notice period, overtime rate (where applicable) and that these comply with the law;
- diversity is embraced, providing fair and equitable treatment of individuals;
- staff receive appropriate on-the-job training;

Brooks Bros (UK) Limited

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Telephone: 01621 877400 • Fax: 01621 859054 • Email: sales@brookstimber.co.uk
Website: www.brookstimber.com

Directors: G A Sherriff, M Sherriff, M C Fleming, S J S Greig, M J Hall, D P McCarthy.
Registered Office: Blackwater Place, The Causeway, Maldon, Essex CM9 4GG • Registered in England Number 1644146
Also at Danbury, Nottingham, Sewstern and Skelmersdale • Goods sold as per Brooks Bros Business to Business Terms of Supply of Goods and Service 2018. Available on request.



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- that staff receive appropriate health and safety training and are provided with a safe working environment in order to carry out their jobs safely;
- there is zero tolerance for harassment, and that grievances are handled swiftly and fairly;
- there is zero tolerance towards bribery and corruption.

Our Whistleblowing Policy provides staff with a clear path to confidentially report any criminal behaviour or misconduct. Any concerns raised are investigated thoroughly and handled confidentially.

We regularly review our policies and procedures to ensure they are current and effective.

Progress in 2016:

- Building in-house knowledge on the Modern Slavery Act within Compliance and HR, including online training
- Modern Slavery Act Policy included in the staff handbook
- Identification of all companies for ancillary services who will be contacted regarding our new Modern Day Slavery Act policy e.g. recruitment agencies, cleaning services, logistics providers etc.

Progress in 2017:

- Building in-house knowledge and auditing skills on detecting modern slavery through participation of Investigative interviewing skills in the workplace, delivered by Gangmasters and Labour Abuse Authority (GLAA).

Progress in 2018:

- No progress.

Next steps (2019-2020):

- Build specialist in-house expertise on modern day slavery within the Compliance .
- Train all staff on the Modern Slavery Act to understand what constitutes modern day slavery and human trafficking and how to report suspected cases.
- Communicate the policy to those companies whose provide ancillary services to detect and prevent slavery and human trafficking.

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Our supply chains

Brooks Bros (UK) Ltd sources timber products from around the world and also sources locally in UK. Key countries from which we directly source include Canada, USA, France, New Zealand, Sweden and Finland as well as Cameroon, Republic of Congo, Ivory Coast, Indonesia, China and Malaysia.

In some cases the supply chain can be short and simple; for example, purchasing logs directly from UK forest managers. In other cases, we may purchase finished products where the supply chain consists of several layers across a number of countries and may include numerous subcontractors and labour agencies, each with different standards.

Brooks Bros (UK) Ltd operates a Due Diligence System to ensure the timber products that we import has been harvested, traded and exported legally in the country of harvest, in line with the EU Timber Regulation. This provides a framework to risk assess and mitigate which can be adapted to include slavery and human trafficking elements.

Our due diligence system is underpinned by our Responsible Purchasing Policy, which lays out our commitment to avoiding forced labour, child labour and discrimination. This can be updated to explicitly to define Modern Day Slavery.

Progress in 2016

- An initial review of existing company procedures to assess what further mechanisms are required
- Assessing how forest certification requirements address modern slavery and how the schemes are adapting to address gaps
- Building understanding of risks in timber supply chains

Progress in 2017

- Building in-house knowledge and auditing skills on detecting modern slavery through participation of Investigative interviewing skills in the workplace, delivered by Gangmasters and Labour Abuse Authority (GLAA). The techniques learned can be applied during supplier audits.
- Maintaining a robust due diligence system for timber imported from outside of the EU, in line with the EU Timber Regulation, which covers workers employment and workers conditions.
- The proportion of timber products that has been third-party certified and legally verified by a leading forest certification scheme has increased by 9.6% and now represents 78.6% of all products purchased.

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Progress in 2018

- Maintaining a robust due diligence system for timber imported from outside of the EU, in line with the EU Timber Regulation, which covers workers employment, workers conditions and third-party rights.
 - Initiated review of company-wide purchasing procedure as part of wider overhaul of Quality Management System
 - Audit of three companies in Cameroon (two existing suppliers and one potential supplier) looking at social issues to a varying degree according to results of risk assessment
- The proportion of timber products that has been third-party certified and legally verified by a leading forest certification scheme has been broadly maintained and represents 78.2% of all purchases in 2018.

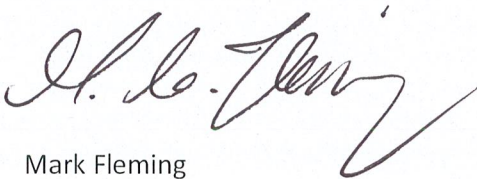
Next steps (2019-2020)

- Update our Responsible Purchasing Policy, Due Diligence System and associated tools to explicitly include slavery and human trafficking.
- Communicate policy to new and existing key suppliers and risk assess supply chains where we have leverage
- Promote greater transparency of other suppliers and raise awareness of policy and risks.
- Where risk is identified, work with our suppliers to stamp out slavery and cease engaging with suppliers who are not committed to complying with the policy; this approach is strongly advocated by slavery abolition experts.

The Board of Directors reviews this statement annually.

Signed by:

Date: 4/4/19.



Mark Fleming

Managing Director, on behalf of the Board of Directors

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