

Modern Slavery Act 2015: slavery and human trafficking

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that DBD Distribution Ltd (referred to as 'DBD') has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. DBD has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

As part of our culture of good governance for good business, at DBD we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers, and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We expect all or who have, or seek to have, a business relationship with DBD and/or any member of our Group to familiarise themselves with our anti-slavery value and to always act in a way which is consistent with our anti-slavery value.

DBD has adopted a statement of our corporate value on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all people or organisations with whom we contract directly or who we appoint to act on our behalf.

Our business

DBD has been delivering Appliance and Kitchen solutions to the Construction Industry for over 30 years and have grown into the UK's leading Appliance Installation Distributor. We have business dealings with all major Appliance Manufacturers across the House Builder market, with access to the widest range of appliances and kitchen furniture from the leading European Manufacturers.

Our high-risk areas

There are no areas of the business that we consider to be high risk, however checks are carried out on our workers to eliminate or minimise the risk where at all possible. Checks are carried out when employment commences and thereafter, where required.

Our policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy: This policy sets out DBD's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment/HR policy: We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees. In addition, in effort to safeguard against human trafficking or individuals being forced to work against their will, we offer comprehensive contracts of employment, clear and detailed policy through an employee handbook and an open and supportive culture and working environment.
3. Whistleblowing policy: We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct: This code explains the way we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers and subcontractors.

DBD actively engages with all its suppliers and subcontractors to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business. In efforts to ensure compliance, we pledge to:

1. Carry out an annual review to ensure suppliers or subcontractor policy (s) comply with our own; and,
2. If a supplier or subcontractor does not have their own policy (s), they confirm acceptance of DBD's.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operation.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we endeavour to provide training to our staff.

Our effectiveness in measuring performance

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Reports from employees, the public, or law enforcement agencies that indicate that modern slavery practices have been identified.
- Use of labour monitoring, right to work documents and payroll systems.
- Completion of audits.

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes the Company's anti-slavery and human trafficking statement.



Jody Charles
Head of HR

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