

This policy and the statement contained within it has been written to confirm Nationwide Windows Ltd (NWW) understanding of The Modern Slavery Act and our commitment to prevent 'slavery servitude and forced or compulsory labour' and 'human trafficking' within the scope of our business.

### **Slavery and Human Trafficking Statement;**

#### **Business overview;**

Nationwide Windows Ltd manufactures, supply's and installs windows, doors, conservatories and curtain walling. The main sectors that the business operates are local authority, new build and domestic.

NWW manufacturing facility and head office are based in Rugby, Warwickshire, in addition to this there are regional depots situated throughout the UK.

All NWW supply chain partners either are, or have UK based offices, no items are procured directly from abroad.

#### **Commencing of the statement;**

NWW is committed to the prevention of Modern Slavery and wants to demonstrate a clear commitment to our stakeholders and other interested parties.

#### **High risk areas;**

- Recruitment
- Materials procurement (supply chain)
- Appointment of bona-fide contractors

The above detailed have been identified as being the areas of the business where Modern Slavery are considered to be most high risk.

#### **Due diligence checks;**

Below set out the controls implemented and planned to mitigate the risk of Modern Slavery occurring within the high risk areas identified;

**Recruitment;** checks continue to be undertaken on potential new recruits to ensure that they are eligible to work in the UK and that their identity is validated. Where employment agency services are utilised, the same checks and balances are implemented.

**Material procurement (supply chain) & appointment of bona-fide contractors;** supply chain questionnaires have been updated accordingly to include a section on modern slavery, these responses are considered as part of the assessment criteria.

#### **Policies;**

Applicable polices that have relevance to Modern Slavery;

- Modern Slavery
- Recruitment
- New Supplier
- Whistleblowing
- Code of Conduct

All of the above mentioned are either individual policies or are contained within the Companies Handbook.

### **Training/ communication;**

NWW are committed to training all relevant personnel on;

- This policy/ statement
- Key indicators that someone may be subject to 'slavery servitude, forced or compulsory labour' and 'human trafficking'
- How to report any concerns internally within the business or to a regulatory body

How will the training be disseminated?

- On induction/ retraining
- Via toolbox talks
- Posters

### **Performance indicators;**

Compliance will be checked by undertaking internal audits, the results of which are communicated as part of the management review process contained within the businesses integrated management systems to senior management.

### **Reporting concerns;**

Where anyone has concerns regarding 'slavery servitude and forced or compulsory labour' and 'human trafficking' please report;

- Internally; to HR, or the Compliance department
- Externally;
  - o Modern Slavery – Phone no; 0800 0121 700
  - o Trafficker or illegal gang master – Phone no; 101

This policy and statement is authorised by and has the full commitment of the board of Directors and is confirmed by the signature of the Compliance Director which appears hereunder. This policy will be reviewed as a minimum annually.

Signed:

Date: 06/08/2021



Mr Chris Costall  
Compliance Director