

evander



MODERN SLAVERY POLICY

## Contents

### Introduction & Definitions

The purpose of this policy is to set out Evander's commitment to mitigating the risk of any modern slavery, forced labour and human trafficking (together, Modern Slavery) within Evander.

Please note that you may also want to refer to the following policies:

- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Code of Conduct
- Data Protection Policy

This policy does not form part of any employee's contract of employment, and Evander reserves the right to amend it at any time in its sole discretion.

The Group Legal Department has overall responsibility for ensuring this policy complies with our legal obligations. While there is not currently legislation equivalent to the UK Modern Slavery Act 2015 in each of the countries in which Evander operates, the employees with supply chain responsibility have primary responsibility for auditing internal control systems and procedures to ensure they are acting in compliance with this policy.

This policy is intended to supplement your Terms and Conditions of Employment, which will set out the specifics regarding the Evander approach to modern slavery. Your Terms and Conditions of Employment will take priority over any terms in this policy in the events of any inconsistencies.

#### **The following definitions are used throughout this policy:**

**Colleague** All Directors, Managers and colleagues of all grades who are employed by the Company or any of its subsidiaries, including temporary agency and contract staff.

**Company ("we"/"our")** Evander Glazing and Locks Ltd

### Scope

The detail in this policy applies to all of our UK colleagues. This policy does not include individuals who are agency workers, consultants or self-employed contractors.

This policy is non-contractual and the Company, therefore, reserves the right to withdraw or modify this policy at any time at its sole discretion and also reserves the sole right of interpretation in respect of its terms.


If you require clarification on any aspect of this policy, please seek support from your line manager or a member of the Human Resources Department. The Human Resources Department will also provide support and guidance for managers to ensure that the policy is consistently applied.

### Minimum Requirements

The requirements set out in this Policy are minimum requirements. Where local legal or regulatory requirements are more onerous, Evander must meet the local requirements in addition to meeting requirements set out in this Policy.

**Version Control**

Revision	Date	Author	Summary of Changes
V1.0	Dec 25	Benny Singleton	Creation of document
V2.0	Apr 26	Benny Singleton	Document Review

Revision	Date	Approver
V2.0	Apr 26	<p>Luke Stone (Managing Director)</p> 

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## **1 Introduction & Definitions**

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## **2 Preventing Modern Slavery**

Modern Slavery can take various forms, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The following list provides some examples of Modern Slavery (but please note that this is not an exhaustive list):

- failing to pay employees and workers in accordance with the applicable national minimum wage;
- making any unlawful deductions from employee's wages;
- requiring employees to work excessive hours which do not conform to local or national laws;
- forcing employees to work overtime, or any other form of forced, non-voluntary work;
- failing to provide a suitable and safe working environment for employees; and / or
- employing workers who are under the legal minimum age of employment.

Evander is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our operations.

Evander is also committed to training colleagues on modern slavery through formal training interventions as well as training colleagues on this policy.

We are committed to ensuring our employees are paid correctly, on time and in full, in accordance with the relevant national laws in place. Where required under local legislation, HR will conduct checks on an employee's right to work in the relevant country in which they are based.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains. We require the same high standards from all of our contractors, suppliers and other stakeholders. We conduct due diligence on companies within our supply chain (including checks on their Modern Slavery policies and practices at the supplier onboarding stage in the UK). In the UK we also include obligations relating to Modern Slavery compliance in our standard supplier contracts. To help ensure that these obligations are met, we engage with suppliers on Modern Slavery issues, particularly those suppliers that we categorise as potentially higher-risk with regards to Modern Slavery.

Should any checks identify non-compliance with our Modern Slavery obligations, the supplier will be required to provide a remedial plan, and if any areas of non-compliance are not resolved to our satisfaction, we reserve the right to terminate that supplier relationship.

In addition, we comply with our legal obligation in the UK to produce an annual Modern Slavery statement and this is published on our website. As part of this process, we conduct an annual review of any Modern Slavery risks which we believe are present within our business activities and supply chain and ensure these risks are eliminated or mitigated.

The prevention, detection and reporting of Modern Slavery in any part of Evander's business or supply chains is the responsibility of all those working for Evander or under our control. You are therefore required to avoid any activity that might lead to, or suggest, a breach of this policy.

### **3 Reporting Concerns About Modern Slavery**

Everyone within Evander has a responsibility to be alert to the risks, however small, of Modern Slavery within our business or in our wider supply chain. You are encouraged to raise concerns about any issue or suspicion of Modern Slavery in any parts of our business or supply chains at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred, or may occur, you must notify the HR Department or in the case of third parties, a member of the Procurement Team.

You can also report it in accordance with our Whistleblowing Policy. If you are unsure about whether a particular act, matter or issue constitutes Modern Slavery, but remain concerned that it may represent a breach of this policy, please still report it in the same way.

Evander encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Evander guarantees that no one will suffer any detrimental treatment as a result of reporting, in good faith, their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chain.

### **4 Breaches of this Policy**

Any employee who breaches this policy may face disciplinary action. We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this .

