Caledonian Plywood Company Ltd

Caledonian Plywood Company Ltd
Fire Door Manufacturing Division

Modern Slavery Act 2015

Anti-Slavery Statement - April 2024.

Introduction

This statement sets out Caledonian Plywood Company's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the year 2024.

As part of Plywood importing and distribution as well as Manufacturing the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Our Commitment

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

We have a zero-tolerance approach to all elements of modern slavery in every part of our business and may terminate our partnership with any individuals or organisations who are found to be in breach of this policy.

Organisational Structure and supply chains

This statement covers the activities of Caledonian Plywood Company LTD

- We were founded in 1990 and have grown to a turnover in excess of £70m due to our focus on quality at each price point, loyalty, shipping and service. We have bases in Uddingston (Head Office), Leeds and Tilbury.
- We have a diverse product range of imported plywood and panel products approved under the Responsible Purchasing Policy, developed by the Timber Trade Federation and audited annually by the Soil Association.

Countries of operation and supply

The organisation currently has elements of our supply chain in the following countries:

- United Kingdom, China, Malaysia, Indonesia, Brazil and Uruguay
- We have ceased all trading with Russia

The below is the point of reference used by the company to assess whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- Global Slavery Index
- Corruption Perception Index 2022
- Foreign and Commonwealth Office
- Global Conflict Tracker

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Risk Analysis

The following Countries of operation are considered to be at the subsequent risk of slavery or human trafficking:

United Kingdom, Brazil	***Low Risk***
China, Malaysia, Indonesia, Uruguay	***Medium Risk***

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **The Board of Directors has the overall responsibility of overseeing this policy and ensuring Caledonian Plywood Company comply with our legal responsibilities as well as considering our ethical obligation to all our employees and others served throughout our supply chain.**
- **The HR Manager to review policy and update annually while monitoring the use of the policy and ensuring it is visible on our website and available when requested.**
- **Management at all levels to ensure policy is adhered to and to ensure all employees reporting to them are aware of the policy, understand it and know how to report suspected violations.**

Compliance and Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- **Caledonian Plywood Company Ltd as Timber Trade Federation Members (TTF) use the Responsible Purchasing Policy (RPP) as our due diligence system and we have it audited annually by the Soil Association. Once that is audited we are awarded our RPP Certificate by the TTF. Our Audit for 2022 for 2021 purchases was passed with no Non-Conformances raised.**
- **FSC and PEFC certification support among others the elimination of all forms of child labour, modern slavery and human trafficking. Caledonian Plywood Company have achieved all elements of this certification and are audited annually to ensure compliance.**
- **Evaluating the modern slavery and human trafficking risks of each new supplier.**
- **Creating an annual risk profile for each country we import from or where our suppliers are based.**
- **Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship where required.**
- **Compliance with the modern slavery act is the duty of all employees of the company and**

suppliers therefore any breach of this policy will be treated seriously. Employees are expected to avoid any type of activity or action that may lead to a breach of this policy.

- If any employee is aware of a breach of this policy, they are expected to report this to the HR Manager for investigation. This can be reported in accordance with our whistle-blower procedure.
- An Annual Statement of compliance will be posted on our website and updated annually.

Training

The organisation requires all staff to familiarise themselves with this policy by the following means:

- All managers will receive a copy of this policy and will be expected to cascade it to their direct employees.
- Annual changes to the policy will be communicated to the management team at the next management meeting or in writing where there is no scheduled meeting.
- This policy will be added as an addendum to the Employee handbook.

All Employees, suppliers and partners of Caledonian Plywood should know:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Labour Abuse Authority and "Stronger together" initiative;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Breaches of this policy

- We may terminate contracts and cease trading with individual, supplier or company who are found to be in breach of this policy.
- Any employee found to be in breach of this policy will face action under the company disciplinary policy (found in the employee handbook), which may result in dismissal if deemed Misconduct or Gross Misconduct.

- Any employee found to have brought a malicious claim of breach of this policy would also be subject to disciplinary action under the company disciplinary policy.

This statement has been reviewed and approved by the Board of Directors at Caledonian Plywood Company Ltd.

Signed on behalf of the Board of Directors:



Derrick Bartlett
Director
1st May 2024