

Kellaway Building Supplies Ltd Modern Slavery Statement

Updated from May 2023



Introduction

In accordance with subsection 54(1) of the Modern Slavery Act 2015 of the United Kingdom, the Kellaway Group hereby issues the following statement regarding human trafficking and slavery. This Act mandates that we annually publish a statement detailing the measures we have implemented to prevent the occurrence of modern forms of slavery and human trafficking in our supply chains and business operations. This statement encompasses the operations of every company within our Group that obtains products and services from the Group supply chain.

Across all of its businesses, Kellaway Group is dedicated to operating responsibly and establishing the highest ethical standards. In our line of work, violations of human rights will not be tolerated.

Our Business

Kellaway Group distributes building materials to small through to large contractors in the wider construction sector as well as local tradespeople and the public. Kellaway Group has five main trading entities trading from over 28 locations. Many of our purchases are routed through NBG, which is a major buying group for independent builder's merchants with 84 members, 300 depots across the UK and a turnover of £750m.

Our principles and policies

Our business practices are a reflection of our unwavering dedication to upholding the utmost ethical principles. Our commitment to workers' rights is outlined in our employment code of practice, which includes the following: the eradication of all forms of forced or compulsory labour, the prohibition of child labour, the protection of freedom of association, and the effective recognition of the right to collective bargaining. Our code of business conduct endorses a broad spectrum of human rights-related issues, including anti-money laundering and anti-bribery, harassment and discrimination, workplace violence, and the preservation of employee privacy.

Other formal policies at Kellaway are designed to encourage lawful and ethical business conduct. The following business policies contribute to our commitment to prevent human rights violations, including modern forms of slavery:

- Dignity at Work Policy
- Health and Safety Policy
- Whistle Blowing Policy
- Data Protection Policy

Annual training is mandatory for all Kellaway employees, including the aforementioned policies as well as any others that are pertinent to their positions. All personnel and agents acting on behalf of the Group or any Group company are required to adhere to the aforementioned guidelines. Infractions will be met with disciplinary measures, potentially culminating in termination for severe misconduct.

Kellaway remains vigilant regarding pertinent legal advancements concerning modern slavery and human rights in order to uphold its dedication to responsible operations and supersede our elevated ethical benchmarks throughout the Group.

Our supply chains

Kellaway Group is dedicated to establishing and maintaining supply chains and operations that are devoid of any modern manifestations of servitude or human trafficking. It is anticipated that organisations, corporations, and other entities that supply, vendor, or contract with the Group (collectively referred to as "suppliers") respect human rights and promote similar principles in their own supply chains.

Kellaway will promptly engage with the relevant supplier and take appropriate action in the event of identified noncompliance; this may involve refraining from appointing or re-appointing the supplier.

We acknowledge that certain products that we acquire for the purpose of resale are sourced from regions globally characterised by a lack of human rights observance. We ensure that all suppliers sourcing from these regions adhere to the most stringent policies and standards, and are subject to internal audits to prevent the use of forced labour and ensure that locals are treated ethically. Additionally, NBG acts on our and all partners' behalf to ensure the establishment and maintenance of the highest standards.

Reporting

Kellaway Group is committed to transparency in our approach to respecting human rights.

We will continue to review any areas of concern highlighted through our Supplier Commitments Programme and work alongside suppliers, customers and interested organisations to eliminate risk from our businesses and supply chain.