

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Ultraframe (UK) Ltd designs and manufactures bespoke glazed and solid roofing systems and other building products for conservatories, orangeries, and single storey extensions. Products are sold to homeowners via a network of fabricators, trade intermediaries and retail installers.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps Ultraframe (UK) Ltd have taken to identify associated risk and to ensure, as far as is practicable, that Modern Slavery is not taking place in its own business or supply chains.

Modern slavery can take various forms such as servitude, forced or compulsory labour and human trafficking. Ultraframe (UK) Ltd continues to engender a zero-tolerance approach to modern slavery through training and communication.

We are committed to acting ethically and with integrity and endeavour to have transparency in all our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls in line with our Modern Slavery Policy, to ensure as much as distinctly possible that modern slavery is not taking place anywhere within our business or supply chains, consistent with the Act.

WHISTLEBLOWING POLICY

Ultraframe encourage all employees or any other individuals working for or on behalf of the company to raise concerns about irregular practices and situations at work which could place Ultraframe (UK) Ltd or individuals associated with Ultraframe in a vulnerable position. These concerns might relate to suspected criminal activity, possible unlawful conduct of fellow employees, modern day slavery, health and safety matters and environmental issues.

Building on previous employee awareness activities, further training has been funded to commence roll out in 2023.

The Board and CEO are committed to the effectiveness of this policy and provide reassurances that if an employee has a genuine concern, they will not suffer any form of retribution because of raising the concern.

RECRUITMENT

Ultraframe has a thorough recruitment and selection process. This includes ensuring that appropriate identity checks are carried out to ensure that all new employees are eligible to work in the UK. Employee awareness has also been raised through a poster campaign. In the last year we have introduced an Anti-Slavery section to our employee inductions.

AGENCY

Ultraframe engage with reputable employment agencies that comply with the Agency Workers Regulations and carry out appropriate checks to establish that workers are eligible to work in the UK.

PAY

All employees are paid directly into a personal bank or building society account in their name. A KPI has been associated with this activity which is reported and reviewed at Board level on at least an annual basis.

SUPPLY CHAIN

The company also expects the same high standards from all its suppliers, contractors, and other business partners and as part of its contracting processes, has included specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standard.

Whilst prior to Covid physical audits of suppliers, identified as operating in a high-risk area, showed no evidence of Modern Slavery, audits are only expected to reach normal levels in 2023.

Approval of new suppliers continues to include confirmation that (to the best of their knowledge) modern slavery is not present in their operation or supply chain. Compliance is captured as a KPI and reported as above.

Working with our current suppliers, supplemental to the supplier audits, we continue to seek their assurance that they operate ethically and responsibly and record that confirmation, as appropriate, in our data capture system.

COMMITMENT FROM THE BOARD

Ultraframe (UK) Ltd is committed to continually improving our policies and procedures to assist in the eradication of Slavery from the modern world.

Approved by the Board of Directors on the 21st of February 2023 for the financial year 1st November 2021 – 31st October 2022.

Signed on behalf of the Board of Directors

A handwritten signature in black ink, appearing to read 'Julian Sturt', written in a cursive style.

CEO, Ultraframe UK Ltd.