

# MODERN SLAVERY STATEMENT

JANUARY 2023



## INTRODUCTION

In accordance with section 54 of the Modern Slavery Act, 2015, This statement sets out Fire Glass UK Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps aimed at ensuring that slavery or human trafficking is non-existent in its own business and its supply chains. This statement relates to processes, procedures, and operations during the financial year April 2022 to March 2023.

As a market leader in the Glass and Glazing industry, the organisation recognises that it has a responsibility to take a robust approach towards eradicating slavery of any sort and human trafficking. To this end, Fire Glass UK Ltd has a clear commitment to our customers, stake holders, and the wider community to ensure that our actions are in line with this mandate.

## ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Fire Glass UK was established in 2008 in United Kingdom, starting out as a single cutting bench with just two staff. With dedication and hard work, the business has grown to one employing over 190 employees with five branches nationwide and a separate installation division. Now, Fire Glass is currently expanding internationally beginning with a branch being established in France. Fire Glass is a nationwide supplier of fire rated and other specialist glass, offering a supply only service or a specialist glazing installation service, our key supply chains involve sourcing raw materials from Europe and Asia.

With regards organisational structure, the

company is controlled by the Managing Director, With the Head Office in Birmingham, United Kingdom, and offices in the North, South, West, Midlands of the United Kingdom and in Scotland. The company also has a senior management level heading key divisions such as Operations, Human Resources, QHSE, Accounts, and Marketing Departments.

## RESPONSIBILITY

Our Accounts/Office Manager is responsible for our supply chain management. Best fit strategies are developed and implemented for each category to deliver best value from the supplier in the areas of risk, cost, sustainability, improvement. and growth.

It is our responsibility to ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same standards.

## RISK ASSESSMENT

Fire Glass UK utilises internal measures in line with international standards and regulatory frameworks to assess our activities and those of our supply chain towards ensuring that the levels of exposure to risk of modern slavery or human trafficking are non-existent.

We utilise the following tools and resources to assess our supply chain and business operations to find out what areas represent the highest risk with regards slavery or human trafficking

- > Supplier Questionnaires
- > ISO standards, procedures, and procurement
- > GGF membership/standards

We also seek to continually review the operations of existing suppliers in relation to the risk of modern slavery and human trafficking. As a business we are confident in our ability to spot signs of modern slavery and human trafficking and put in place measures to eradicate those tendencies, business partnerships, or relationships.

## RELEVANT POLICIES AND ONGOING COMMITMENT

Fire Glass UK operates the following policies that demonstrate its approach towards the identification of modern slavery risk and ensures relevant steps are taken to prevent slavery, human trafficking, forced and bonded labour of any sort in its operations and that of its supply chain.

### Whistleblowing policy

The organisation encourages its employees, customers, and other business partners to report any concerns related to the organization's direct activities, its supply chains. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation Employees, Customers or Stakeholders who have concerns can complete our confidential employee suggestion/improvement forms.

### Employee Suggestion Forums:

Fire Glass UK Ltd operates and strongly encourages employee suggestions and improvements. These suggestions or concerns are adequately addressed by the relevant teams. The business, in view to encourage its employees to speak up and share suggestions for improvements and

<b>MIDLANDS</b>	<b>NORTH</b>	<b>SOUTH</b>	<b>EAST</b>	<b>WEST</b>	<b>SCOTLAND</b>	<b>INSTALLATION</b>
0121 667 9089	0161 532 8371	01206 805 922	0121 667 9089	01174 528 800	0131 526 4141	0121 667 9089



areas of concerns introduced rewards and recognitions for employees or stakeholders who utilize the suggestions platform.

### Employee code of conduct

The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. The organisation's standpoint on matters regarding modern slavery and trafficking is made clear in its organizational handbook as well as in a dedicated policy on Modern Slavery.

### Supplier/Procurement code of conduct

The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour prior to establishment of business relationships or partnerships with Fire Glass UK. The organisation also works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions where applicable. In addition, serious violations of the organisation's supplier code of conduct will lead to the termination of existing business relationships.

### Recruitment/Agency workers policy

The organisation utilises only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it may use prior to accepting workers from such an agency, this ensures strict compliance with the MSA, 2015.

## 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:

- > Communicating our supplier code of conduct to all new and existing suppliers this ensures all suppliers know the stance of the business with regards to Modern Slavery and Human Trafficking.
- > Evaluating the modern slavery and human trafficking risks of each potential new supplier prior to establishment of business relationship with such.
- > Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping to enable us spot new trends and make early interventions as required.

- > Supplier audits or assessments conducted by the organisation's Accounts Manager
- > Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.
- > Participating in collaborative initiatives focused on slavery and human trafficking.
- > Establishment of recruitment processes and policies which prevent forced or bonded labour.
- > Establishment of processes for any employee, customer, or stakeholder to report any concerns.
- > 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 as appropriate.

Following the above measures, None of Fire Glass UK branches have been convicted for the use of forced or bonded labour this standard will continue to be upheld.

## TRAINING

The organisation requires the Managing Director, Procurement Manager, all supply chain managers, SHEQ Manager, HR professionals as well as all employees within the organisation to complete training on modern slavery at the start of their employment with Fire Glass UK. Further to this, refresher trainings are conducted at intervals to reemphasize the importance of ensuring modern slavery continues to be non-existent in all business operations.

The organisation's modern slavery training covers:

- > 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, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.
- > What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies
- > 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.

We also expect our key suppliers to provide such training to their staff.

## AWARENESS-RAISING PROGRAMME

As well as training staff, the organisation continues to raise awareness of modern slavery issues by distributing flyers to staff, putting up posters across the organisation's premises, displaying relevant content on our communication screens, and circulating a series of emails to staff

The posters/emails explain to staff:

- > the basic principles of the Modern Slavery Act 2015.
- > how employers can identify and prevent slavery and human trafficking.
- > what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- > what external help is available, for example through the Modern Slavery Helpline.

## BOARD/MEMBER APPROVAL

This statement constitutes our organisation's slavery and human trafficking statement for the financial year ending March 2023 and has been approved by the organisation's Managing Director, who will review and update it annually.

Director's signature:



Date: January 2023