

# John Flowers Ltd - Modern Slavery Act

The introduction of the modern slavery Act 2015 states that any organisation that meets the following criteria must produce an annual slavery and humans trafficking statement.

A commercial organisation is within this subsection of it, if.

- a) Supplies good or service and
- b) Has a total turnover of not less than 36 million

A slavery and human trafficking statement for a financial year is.

a) A statement of the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chain.

John Flowers Ltd does not fall within the criteria which requires the company to make an annual statement, but the company does not condone slavery or human trafficking and will therefore check that our supply chain comply with the regulations.

John Flowers Ltd are committed to ethical procurement and transparency within their supply chain.

## John Flowers Limited Modern Slavery Policy

Copy of policy issued to each member of staff, client and supply chain

This policy is made pursuant to of the Modern Slavery Act 2015 and sets out the steps that John Flowers Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. John Flowers Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### Our business

John Flowers Limited works on a national basis and work consists of the roofing works in commercial and domestic properties.

## Our high-risk areas

We have not identified any areas of high risk within our organisation in relation to the Modern Slavery Act 2015.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Anti-slavery policy this policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

Recruitment policy we operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Whistleblowing policy we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Code of business conduct this code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

# Our suppliers

John Flowers Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery.

Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

They have taken steps to eradicate modern slavery within their business

They hold their own suppliers to account over modern slavery

They pay their employees at least the national minimum wage / national living wage as appropriate.

We may terminate the contract at any time should any instances of modern slavery come to light.

### **Training**

We conduct training and awareness for our staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed:

**Position:** Director John Flowers

**Produced:** 01 January 2020

Reviewed: 17 October 2022

Next Review: 17 October 2023

Address: John Flowers 2 Monument Park, Pattinson Industrial Estate, Washington, Tyne and Wear NE38 8QU

Telephone: 0191 418 6878 Fax: 01914186890 Email: info@johnflowers.co.uk