

7 June 2021

## **Victorian Plumbing Ltd Modern Slavery Act Statement**

This Slavery and Human Trafficking Statement is made by Victorian Plumbing Ltd (referred to in this statement as 'We', 'the Organisation' and 'Victorian Plumbing') for purposes of the Modern Slavery Act 2015.

For purposes of this Statement, "Modern Slavery" encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse, or threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or having restrictions placed on freedom of movement

### 1. Structure and Business

Victorian Plumbing Ltd is an online retailer of bathroom fixtures, accessories and decor products. It is headquartered in Skelmersdale, England with other sites across the North West and Midlands.

Products sourced from the UK, the EU, the Middle East, South Asia and East Asia are sold to consumers in the UK, EU and worldwide through the Organisation's principal trading website, [www.victorianplumbing.co.uk](http://www.victorianplumbing.co.uk).

The Organisation employs staff at its UK sites across Merseyside, Manchester and Birmingham. Approximately 85% of its staff were directly employed and not in any category generally accepted as vulnerable to Modern Slavery in the United Kingdom.

### 2. Policies in relation to Modern Slavery

Victorian Plumbing Ltd recognises its responsibilities to prevent Modern Slavery. The Organisation commits to complying with the provisions in the Modern Slavery Act 2015 through continuous review of practices in relation to its own labour force and in relation to the labour force employed by its suppliers.

In terms of our own employees, we ensure that all employee working hours are within limits set by the Working Time Regulations 1998. All employees are paid in accordance with the National Living Wage. We pay particular attention to providing safe and environmentally friendly working conditions.

We occasionally require temporary employees to work at our UK facilities to meet short term peaks in demand for our products and services. These workers were employed via recruitment agencies who are of reputable standing, and we require

these agencies to ensure that all temporary workers have valid documentation and the right to work in the UK.

In terms of our supply chains, we do not knowingly enter into and/or continue to do business with any other organisation, in the United Kingdom or abroad, which supports or is found to engage in practices amounting to Modern Slavery.

### 3. Due Diligence Processes

In respect of our overseas supply chain, we have begun a programme of physical on-site inspections of factories and administrative offices using detailed audit checklists. Suppliers are required to evidence that employment is freely chosen, that freedom of association and the right to collective bargaining are respected, that working conditions are safe and hygienic, that child labour is not used, that living wages are paid, that working hours are not excessive, that no discrimination is practiced, that regular employment is provided, that no harsh or inhumane treatment is allowed and that practices to preserve the environment are implemented. Photographic evidence is taken to support the audit findings.

These audits are conducted by investigators engaged by us, and our suppliers are required to be open and transparent with our investigators. We grade compliance with our standards, with each grade indicating the severity of the identified concern and the urgency for the supplier taking corrective action. Corrective actions are then audited. Supplier's who do not remediate identified issues within the stipulated time are to be removed from our supply chain.

### 4. Risk Areas & Mitigation Of Risk

The main area of risk in Victorian Plumbing's normal course of business is within the supply chain for the goods we buy directly from manufacturers, particularly goods manufactured overseas. We mitigate this through the audits described above. We do not rely on sole suppliers, so we have the ability to discontinue suppliers if they do not meet our standards.

Our indirect supply chain through which we purchase goods through intermediates, also exposes us to Modern Slavery risk. This is a target area for further review and, if necessary, corrective action..

### 5. Impact of COVID-19

During the period covered by this statement, the impact to normal day-to-day conditions caused by COVID-19 caused no delay or change to our focus on the prevention of Modern Slavery, as described above.

### 6. Focus Going Forward

Our focus going forward is as follows:

- The Organisation plans to open a foreign office in each large supply country to allow for closer working relationships and more frequent audit processes.

- We plan to update all supplier agreements and purchase orders to give contractual force to the measures we expect our direct and intermediary suppliers to take to prevent Modern Slavery.
- We will expand our programme of supplier inspections.
- We will provide training to our staff so that they can spot any indicators of Modern Slavery as they interact with our own workforce and with supplier personnel.
- As indicated above, we will have a particular focus on our supply chain with intermediates.

This policy statement concerning Slavery and Human Trafficking is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our statement for the financial year ending September 2020 and looking forward. This policy statement was approved by our Board of Directors on 7 June 2021.

DocuSigned by:

*Paul Meehan*

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