

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

It continues to be a priority for Victorian Plumbing Ltd (referred to in this statement as 'We', 'the Organisation' and 'Victorian Plumbing') to improve our practices to combat slavery and human trafficking. We are committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains anywhere in the world.

This Slavery and Human Trafficking Statement is made by Victorian Plumbing for the purposes of the Modern Slavery Act 2015 in respect of the financial year ended 30 September 2021.

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, Eastern Europe, the Middle East, North Africa, South Asia and East Asia are sold to consumers principally in the UK, but occasionally to consumers in the EU and worldwide through the Organisation's trading website, [www.victorianplumbing.co.uk](http://www.victorianplumbing.co.uk).

The Organisation employs staff at its UK sites across Lancashire, Merseyside, Manchester and Birmingham. As at 30 September 2021, being the financial year end, approximately 90% 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 is committed to complying with the provisions in the Modern Slavery Act 2015 through continuous review of practices in relation to both its own labour force and 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 are 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, this year we invested in our purchasing and procurement team, and also engaged a team in China to enable us to proactively manage our key supplier relationships in that region.

At the same time we began a programme of physical on-site inspections of factories and administrative offices using detailed audit checklists. 34 of these audits were completed in China during the year, and a number of additional audits have been completed in China since the end of the financial year.

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. Suppliers who do not remediate identified issues within the stipulated time are 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.

To mitigate this risk, this year we have developed a supplier code of conduct setting out our minimum requirements and have required all of our suppliers of goods to sign up to it. In addition, as described above, we also mitigate our risk 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 intermediaries, also exposes us to Modern Slavery risk. This continues to be 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 will either open a foreign office, or will engage the services of an appropriate third party, in each large supply country for the purposes of conducting regular audit processes.
- We plan to update our arrangements with suppliers 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, and will also require suppliers to provide regular written confirmation of their compliance with our code of conduct.
- 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 2021 and looking forward. This policy statement was approved by our Board of Directors on 24 March 2022.

**Paul Meehan**  
**Director**

**Victorian Plumbing Ltd (registered number: 04079213)**  
**22 Grimrod Place**  
**Skelmersdale**  
**WN8 9UU**