

Victorian Plumbing

**Modern
Slavery Act
Statement**



**victorian
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Modern Slavery Act Statement

At Victorian Plumbing Ltd (referred to in this statement as 'We', 'the Organisation' and 'Victorian Plumbing') we are fully committed and support the government's objectives to eradicate 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 Modern Slavery Statement is made by Victorian Plumbing for the purposes of the Modern Slavery Act 2015 in respect of the financial year ended 30 September 2023.

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 is the UK's leading bathroom retailer. It is headquartered in Skelmersdale, England with other sites across the North-West and Midlands.

Products sourced from the UK, Europe (both within and outside the EU), the Middle East, North Africa, South Asia and East Asia are sold to consumers and trade customers principally in the UK, but occasionally to customers in the EU and worldwide through the Organisation's trading website, www.victorianplumbing.co.uk.

The Organisation employs staff at its UK sites across Lancashire, Merseyside, Manchester and Birmingham. At 30 September 2023, being the Organisation's financial year end, approximately 95% 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 applicable legislation. All employees are paid at least 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.

We have a number of policies that exist, with the aim to protect the welfare and basic human rights of employees within our business and our supply chains. The policies reflect our commitment to acting ethically and with integrity in all our business relationships, helping to ensure that slavery and human trafficking is not taking place anywhere in our business. We expect all those in our supply chains to comply with this approach. Key policies include a supplier code of conduct, anti-bribery policy and whistleblowing policy.

3. Due Diligence Processes

In respect of our overseas supply chain, we have continued to work with a team in China to enable us to pro-actively manage our key supplier relationships in that region.

We have also continued our programme of physical on-site inspections of factories and administrative offices in China 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. 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, we have 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 intermediates, also exposes us to Modern Slavery risk. This continues to be a target area for further review and, if necessary, corrective action.

5. Focus Going Forward

Our focus going forward is as follows:

- We will continue to review our arrangements with suppliers to enhance our contractual force in respect of the measures we expect our direct and intermediary suppliers to take to prevent Modern Slavery.
- We will continue our programme of supplier inspections.
- We will continue to 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 2023 and looking forward. This policy statement was approved by our Board of Directors on 26 March 2024.

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Director
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