

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 Modern Slavery. 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 2024.

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 Leyland, England with other sites across the North-West and Midlands.

Products sourced from the UK, Europe, 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 internationally through the Organisation’s trading website, www.victorianplumbing.co.uk.

The Organisation employs staff at its UK sites across Lancashire, Merseyside, Manchester and Birmingham.

2. Policies in Relation to Modern Slavery

Victorian Plumbing recognises its responsibilities to prevent Modern Slavery. We are committed to complying with the provisions in the Modern Slavery Act 2015 through continuous review of practices in relation to both our 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 workers to work at our UK sites, for example, to meet short-term peaks in demand for our products and services. These workers are employed via reputable recruitment agencies. 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 or continue to do business with any other organisation which supports or is found to engage in practices amounting to Modern Slavery.

We have a number of policies that exist with the aim of protecting 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 Modern Slavery 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 proactively manage our key supplier relationships in that region.

We have also continued with 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. Members of the Organisation's Executive Leadership Team also periodically attend the audits. 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

A key area of risk in Victorian Plumbing's normal course of business is within our supply chain for the goods we buy directly from manufacturers, particularly overseas.

To mitigate this risk, we have a supplier code of conduct setting out our minimum requirements and require all of our suppliers of goods to sign up to it. In addition, as described above, we also mitigate our risk through audits. We do not rely on sole suppliers, so we are able to discontinue working with any supplier that does 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 corrective action, if necessary.

5. Focus Going Forward

Our focus going forward is as follows:

- 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.
- Continue our programme of supplier audits.
- Raise awareness of Modern Slavery, both within our business and our supply chains, through training.
- Focus on our supply chain with intermediates.

This statement on Modern Slavery is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our statement for the financial year ending 30 September 2024. This policy statement was approved by our Board of Directors.

Daniel Barton
Director

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