



J T DOVE LIMITED: STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

PURPOSE

In accordance with the Modern Slavery Act 2015, J T Dove Limited (the Company) publishes this statement on its web site. The statement is for the company's financial year commencing 1st January 2017. The purpose of the statement is to show that the company does not engage in slavery or human trafficking and is taking steps to ensure, as far as reasonably practicable, such activities are not taking place in the supply chain.

DEFINITIONS

Slavery is holding a person in slavery or servitude. For example, forced labour. Trafficking is arranging or facilitating the travel of a person with a view to exploiting that person. For example, arranging for a person to travel knowing they would be forced to work in slave conditions.

COMPANY BACKGROUND

J T Dove was founded in 1869, incorporated in 1905 and became an employee benefit trust in 1954. The company's principal business is supply of building and plumbing and heating material to contractors and the general public. All company operations take place within the UK and all its employees live within the UK.

RISK OF SLAVERY WITHIN THE COMPANY

The company complies with all aspects of UK employment law. It has robust recruitment and employment policies and welfare policies exceeding statutory requirements. These policies are properly enforced and clearly set out in a staff handbook and a policy and procedures document. Furthermore, being an employee benefit trust, shares in the company are held in Trust, for the benefit of employees, by Herbert Dove Trustees Limited. The Trustees are appointed independently from the company by the Newcastle University. Although the Trustees have no day-to-day operational responsibilities they take a keen interest in the welfare of all staff employed by the company. Compliance with all employment related law, clear written policies and the independent element provided by the Trustees gives confidence there is no risk of the company engaging in human trafficking or slavery.

RISK OF SLAVERY WITHIN THE SUPPLY CHAIN

The company has numerous suppliers, all of whom are based within the UK. All the suppliers are subject to UK law, including compliance with the Modern Slavery Act 2015. This reduces the risk of suppliers engaging in human trafficking or slavery. In the case of major suppliers, there is a close commercial relationship with the company usually developed over many years. This gives an insight into the integrity of the supplier and gives confidence it is unlikely they are engaged in any aspect of slavery.

Some material supplied to the company will have been imported by its suppliers. The company looks to its suppliers to take steps to ensure imported material is not sourced from foreign suppliers engaged in slavery related activities. However, during the course of 2017, the company will progressively check that its own suppliers have suitable anti-slavery policies. Priority will be given to any importing material from parts of the world vulnerable to slavery.



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The company is a member of a large buying group, which vets suppliers before material is supplied to members. The company has excellent computerised audit systems, so all material purchased from suppliers can be traced to a named and verifiable UK supplier.

During the course of 2017, managers and staff responsible for purchasing stock and dealing with suppliers will be given suitable training on signs that a supplier may be involved in slavery.

The company's current view is that the nature of its business presents a low risk that slavery activity is taking place in the supply chain.

RESPONSIBILITIES

The board of directors are responsible for this statement and generally ensuring human trafficking and slavery are given a suitably high profile within the company.

The commercial director will be responsible for developing policies relating to whether or not suppliers have suitable anti-slavery policies. The Director of Operations will be responsible for developing training requirements. Shaw Gunn Limited, the company's external employment consultants, will advise on any internal procedures required to make sure slavery is not taking place within the company.

All staff, regardless of position, are responsible for reporting any suspicions about human trafficking or slavery whether within the company or a supplier. Reports must be made to a line manager or a director and can be made in strict confidence under the company's whistle blowing policy.

This statement will be updated no later than 1st January 2018.



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