



STATEMENT ON SLAVERY AND HUMAN TRAFFICKING

PURPOSE

1. In accordance with the Modern Slavery Act 2015 (the Act), J T Dove Limited (the company) publishes this statement on its website. The statement is for the company's financial year commencing 1 January 2021. 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 its supply chain. The company fully supports this legislation and the drive to combat any abuse of human rights.

DEFINITIONS

2. 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

3. 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 trade and the general public. All company operations take place within the UK and all its employees live within the UK. The company operates 20 sites across the North of England and Scottish Borders including a head office based in Newburn, Newcastle.

RISK OF SLAVERY WITHIN THE COMPANY

4. The company complies with all aspects of UK employment law and has robust recruitment, employment and welfare policies in place to protect and safeguard employees from the risk of modern slavery and human trafficking. These policies are enforced and clearly set out in the terms and conditions of employment and Employee Handbook provided to all colleagues. 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 independently appointed by Newcastle University. Although the Trustees have no day-to-day operational responsibilities, they take a strong and active interest in the welfare of all employees.
5. The company Whistleblowing Policy seeks to prevent malpractice within the workplace and encourages colleagues with genuine concerns to report any wrongdoing to the relevant persons. Along with other company policies, it outlines the behaviours which are expected from employees and encourages them to report any variations to the expected levels of conduct.
6. Compliance with all employment related law, clear written policies, the independent element provided by the Trustees and the flat hierarchical structure of the business allowing for greater communication at all levels, gives confidence slavery is not taking place within the company.
7. The health and safety of all colleagues across the business is of paramount importance. Southall's an independent health and safety consultancy are engaged by the company to ensure we demonstrate best practice across our entire operations. This has been an essential element of identifying and addressing risks to our workforce during the Coronavirus pandemic and ensuring we have enhanced measures in place to prevent the spread of Coronavirus and support colleagues where they need to self-isolate.

RISK OF SLAVERY WITHIN THE SUPPLY CHAIN

8. The company has numerous suppliers, all of whom are based within the UK. Suppliers are subject to UK law, including compliance with the Modern Slavery Act 2015. This reduces the risk of suppliers engaging in slavery or human trafficking. There is a close commercial relationship between the company and its suppliers, usually developed over many years. This gives such a

good insight into the integrity of suppliers; it is reasonable to conclude they are not engaging in slavery or human trafficking.

9. Some material supplied to the company will have been imported by its suppliers. The company looks to its UK suppliers to take steps to ensure imported material is not sourced from foreign suppliers engaged in slavery related activities. However, the insight referred to in the preceding paragraph gives confidence that its reputable suppliers are not importing material from foreign sources engaged in slavery related activities.
9. The company is a member of a major buying group. The standard agreement between the group and its suppliers requires that suppliers meeting the £36m threshold, specified in the Act, must comply with the requirements of the Act. As an indication of the scale of the supply chain to group, its members generate annual revenue of circa £1.4billion. While it is for individual suppliers to meet their own legal obligations, group administrators take reasonable steps to monitor compliance with the Act. The current level of confirmed compliance is 86%. This is a high level of confirmed compliance, but with the scale of the supply chain and the number of suppliers to the group frequently changing, there is always a period when it is not practical to ensure 100% compliance.
10. The actions of the buying group certainly complement the company's own efforts relating to modern slavery in the supply chain, but the company will be judged on its own actions. The company has in place excellent computerised audit systems, which ensure that every purchase from a supplier can be traced to a reputable and approved UK supplier. This reduces the risk that purchases are from unknown or dubious sources more likely to be involved in modern slavery.
11. The company's view is that the risk of slavery or human trafficking, in the supply chain, continues to be very low. Nevertheless, there is no room for complacency and employees at all levels will continue to be made aware of the risk of slavery, in the supply chain, and reminded of the need for vigilance. During the Coronavirus pandemic, it is essential that we remain vigilant to the fluctuations in demand and changes in business operating models which may lead to new or increased risks of exploitation. To this end, in 2021, modern slavery will continue to be an agenda item on senior management meetings and local branch or departmental meetings.

RESPONSIBILITIES

12. The Board of Directors are responsible for this statement and generally ensuring that the risk of human trafficking and slavery are given a suitably high profile within the company.
13. The commercial director is responsible for developing policies relating to whether or not suppliers have suitable anti-slavery policies. The Operations Director in conjunction with HR is responsible for developing training requirements within the company. The Human Resources Manager, will be responsible for developing internal policies and procedures required to make sure slavery is not taking place within the company and ensure working arrangements are such to avoid risks in any part of the business.
14. All employees, 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 human resources and can be made in strict confidence under the company's whistleblowing policy, which was updated in September 2020 to ensure it adequately accommodates reporting of such issues.
15. This statement will be updated and republished in January 2022 as part of our continued commitment to reviewing our approach.

Steve Robinson
Managing Director