

J T DOVE LIMITED: 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 web site. The statement is for the company's financial year commencing 1 January 2018. 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 abhors slavery and human trafficking and will robustly play its part in preventing these abhorrent crimes.

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 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

4. The company complies with all aspects of UK employment law and has robust recruitment, employment and welfare policies. These policies are 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 independently appointed by the Newcastle University. Although the Trustees have no day-to-day operational responsibilities they take a strong and active interest in the welfare of all staff.
5. In 2017, the company conducted a staff survey covering all significant areas of employment including health and safety and welfare. The survey was anonymised to encourage staff to express honest views. Of the 229 staff surveyed there was a response rate of 80% this is a very high response rate. 85% of responses were positive and this is exceptionally high. There were no indications whatsoever, in the survey, that slavery was taking place within the company.
6. Compliance with all employment related law, clear written policies, the independent element provided by the Trustees and the staff survey gives confidence slavery is not taking place within the company.

RISK OF SLAVERY WITHIN THE SUPPLY CHAIN

7. 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 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.

8. 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.
9. The company is a member of a major buying group. In 2017, administrators of the buying group progressively checked that suppliers to the group, meeting the threshold of £36million, had taken steps to ensure that slavery and human trafficking was not taking place in their supply chain or within their own business. Of the 460 suppliers to the group, 80% confirmed compliance. From a standing start, this was a good level of confirmed compliance. However in 2018, steps will be taken to confirm 100% compliance by suppliers meeting the threshold. Furthermore, it will become part of the standard agreement, between the group and its suppliers, that suppliers meeting the threshold must confirm compliance with the Act if they wish to continue as a supplier to the group. As this effects the overwhelming majority of the suppliers to the company, these are significant steps.
10. The company has excellent computerised audit systems, so all material purchased from suppliers can be traced to a named and verifiable UK supplier.
11. During the course of 2018, managers and staff responsible for purchasing stock and dealing with suppliers will remain vigilant and report any suspicions of slavery or human trafficking no suspicious activity reports were made in 2017.
12. The company's view is that the risk of slavery or human trafficking, in the supply chain, continues to be very low.

RESPONSIBILITIES

13. The board of directors is responsible for this statement and generally ensuring that the risk human trafficking and slavery are given a suitably high profile within the company.
14. The commercial director is responsible for developing policies relating to whether or not suppliers have suitable anti-slavery policies. The operations director is responsible for developing training requirements within the company. 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.
15. 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.
16. This statement will be updated in January 2019.