

Walter E. Sturges & Sons Ltd Slavery and Human Trafficking Statement 2019

The Modern Slavery Act 2015 (MSA 2015) focuses specifically on the issue of modern slavery to ensure offenders are suitably reprimanded with severe sentences. Modern slavery encompasses the offences of: 'slavery' where ownership is exercised over a person; 'servitude' which involves the obligation to provide service imposed by coercion; 'forced or compulsory labour' involves work or service exacted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily; and 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

The MSA 2015 requires large businesses, with sales of over 36 million, to be transparent about their efforts to eradicate Slavery and Human Trafficking. This statement therefore explains the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or any part of our business.

The organisation is composed of six retailing location across Leicestershire and our head office is in Leicester, Broughton Astley site. Currently we work closely with around 100 UK based suppliers.

We have policies in place internally, which are available to all staff and these can be accessed by third parties on request, simply contact HR Department for a copy. Our policies are reviewed annually by the organisation's Human Resources department and the Board to ensure we remain compliant.

As part of the organisation's induction process and throughout workers' employment with us, we train all staff to treat others with respect and courtesy as well as ensuring they adhere to all relevant laws, regulations and standards. This is an ongoing due diligence process. We focus on ensuring our management team is not only aware of the requirements to be alert to modern slavery but can also address concerns raised by their team or any suppliers. If any worker is found in breach of our policies, we ensure suitable disciplinary action is taken which can include termination.

As mentioned in 2018 statement, we are developing a system for supply chain verification expected to be in place by end of 2019 whereby the organisation evaluates potential suppliers before they enter the supply chain.

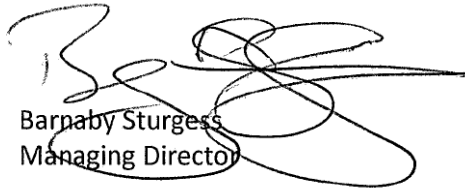
By end of 2019, the Company is going to provide an obligatory Modern Slavery training to ensure that all employees are aware how to identify and address potential modern slavery risks.

We also ensure that:

- Our colleagues are all provided with a written contract of employment as well as access to a company handbook which contains any policy that affects their employment. Each employee has a personal responsibility to read the handbook, as well as to ensure that they fully understand our obligations and the consequences associated with any breach of those obligations.
- We recruit only candidates that hold full right to work in the UK all of whom have provided us the evidence of the right to work.
- We ensure that our employees are paid at least National Minimum Wage or National Living Wage or more.
- The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- Managing Director and/or HR Department are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

We allow all individuals who work or provide services to us the right to freely choose employment and, the right to associate freely with other individuals. Workers are free to choose whether to join a trade union or not and as a result of our training, we offer an environment which is free from harassment and unlawful discrimination. We ensure our working practices are in accordance with the Equality Act 2010 and all employment legislation. We do not engage in forced or involuntary labour and have a zero-tolerance approach to the same, meaning we do not tolerate any of our suppliers engaging in such conduct. We require suppliers to certify that they do not participate in any forced or involuntary labour with their workers, subcontractors, agents or associates. We aim to ensure that our performance indicators do not put pressure on or influence any modern slavery risk by:

- Developing and implement training to our Management Teams to identify, assess mitigate and report specifically on modern slavery
- Ensuring that our confidential colleague reporting line is clearly promoted in all Sturgess sites



Barnaby Sturgess
Managing Director

11th June 2019