

# ROXOR

## Modern Slavery Statement for Financial Year 2018/19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Roxor Group Ltd. has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Roxor Group Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

Roxor Group Ltd. is the holding group of the following subsidiaries:-

#### **Ultra Finishing Ltd.**

UK based Manufacturer and Supplier of Bathroom Products to Distributors.

#### **Niko (Int) Ltd.**

UK based Manufacturer and Supplier of Bathroom Products to Distributors.

#### **Shanghai PTB sanitaryware**

Based in Shanghai, PRC, PTB are Manufacturers of Shower Enclosures, Bath screens, Ceramics and Wooden Furniture for Ultra Finishing Ltd. and Niko (Int) Ltd.

#### **B C Designs (Int) Ltd**

UK based Wholesaler of hardware, plumbing and heating equipment.

#### **Fireclay Factory LLC**

Manufacturer of Bathroom and Kitchen products based in Fujairah, UAE.

### **Our high-risk areas**

We manage the risks in our global operations and supply chain through supplier assessment, including social audits on suppliers from higher risk countries.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Equal Opportunities Policy
- Harassment & Bullying Policy
- Anti-Bribery, Corruption and Fraud
- Ethical Code of Conduct Policy
- Whistleblowing/Malpractice Policy
- Succession Planning Policy
- Modern Slavery & Human Trafficking Policy
- Competition Law Policy

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## Our suppliers

Roxor Group Ltd. operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

## In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

## Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- Less than acceptable supplier audit rating of a current supplier
- Supplier statements concerning their conformance to the requirements of the Modern Slavery Act inclusive of their subcontractors

During the financial period 2018-2019 there have been no indicators that we or our suppliers have contravened the requirements of the Act.

## Approval for this statement

This statement was approved by the Board of Directors on

Name (Director) MICHAEL DUGGLESBY

Signature



Date 27/3/19