

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

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Executive Summary

This statement sets out Arbor Forest Products Limited's ('the company') actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The company recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisation Structure Supply Chain Management & Process for the Prevention of Modern Slavery

Arbor Forest Products is a major importer, further processor and distributor of forest products throughout the UK, with our primary manufacturing facility at New Holland, North Lincolnshire.

We have implemented this policy with the aim of prevention of opportunities from modern slavery to occur within its business or supply chain.

Supply Chain Management & Process for the Prevention of Modern Slavery

The company is committed to introducing, if not in place already, the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy: The company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact our HR Department.

Employee Handbook: The company's handbook makes clear to employees the actions and behaviour expected of them when representing the company. The company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier/Procurement code of conduct: The company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

Recruitment/Agency workers: The company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Corporate Social Responsibility and Responsible Sourcing: The Company operates well engrained CSR and Sourcing procedures which will run in conjunction with the Modern Slavery Policy. It operates alongside and is complimentary and ensures Arbor Forest Products operates to the highest possible standards.

Due Diligence – The company will undertake on-going due diligence when considering taking on new suppliers. The company will complete a number of activities as part of its due diligence and these include:

Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;

Ensure all timber suppliers are FSC/PEFC compliant which includes a self-assessment declaration of that they do not take part in activities which would fall under the Modern Slavery Act.

Evaluating the modern slavery and human trafficking risks of each new supplier based on geographical location and reputation of the country the product is manufactured in.

Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified;

Responsibility

The Board of Directors has the overall responsibility for ensuring this policy and its implementation comply with legal and ethical obligations and managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given the adequate and regular training on it and the issue of modern slavery.

Review & Approval

Following its initial adoption, this Anti-Slavery and Human Trafficking policy will be reviewed by the Board of Directors on a regular basis and may be amended accordingly.