

MODERN SLAVERY STATEMENT

A) ORGANISATION

This statement applies to **James Hargreaves Group** which is a trading style of **James Hargreaves (Plumbers Merchants) Ltd** (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year **2018**.

B) ORGANISATIONAL STRUCTURE

The parent company of James Hargreaves (Plumbers Merchants) Ltd is James Hargreaves (PM) Ltd and the ultimate parent company is James Hargreaves Holdings Ltd. James Hargreaves (Plumbers Merchants) Ltd is the only trading company. The other two companies are non-trading holding companies only.

James Hargreaves Plumbers Merchants Ltd trades using a corporate logo: "**James Hargreaves Group**". The company consists of "James Hargreaves Plumbing Depot", "James Hargreaves Bathrooms" and "James Hargreaves Renewable Energy".

The organisation consists of a large head office, main, showroom & warehouse facility with smaller branches and showrooms across the country. We are one company with a group trading style only.

The organisation is controlled by a board of five directors and three regional directors, assisted by a branch manager and assistant manager at each location.

The organisation head office is based on Todmorden Road in Burnley, Lancashire. We have branches across the country, mainly across Lancashire and all areas of Yorkshire, but also covering Merseyside, Cumbria, the North East, Manchester, Cheshire, Lincoln, the Midlands and other locations down South as far as Hertford.

The main activity of the organisation is the sale of plumbing, heating, bathroom products to trade, retail & housing developers / contract customers.

In addition we offer underfloor heating & renewable energy solutions including sale of ground and air source heat pumps, Biomass (wood pellet) burners and solar energy solutions

The organisation performs the sale of these goods in store and via a free delivery service. There is a constant demand for goods with some seasonal trends such as an increase in heating sales following around late Autumn.

The Organisation works only within the United Kingdom but, has on very rare occasion, exported goods by freight carrier, normally organised by the customer. Whenever possible we avoid working outside of the United Kingdom

C) DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. James Hargreaves Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

In the pursuance of the provision of its own services **James Hargreaves Group** only use their own employees. The organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and we undertake relevant pre-employment checks prior to staff being employed.

E) SUPPLY CHAINS

In order to fulfil its activities, **James Hargreaves Groups** main supply chains include those related to the supply of plumbing, heating bathrooms & renewable energy solutions, predominantly in the United Kingdom.

Many of our organisations first tier suppliers are the manufacturers of the products with a large majority based in the United Kingdom or other European countries. We understand that some of the organisations first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

F) POTENTIAL EXPOSURE

The Organisation considers it has little, if no chance of direct exposure to the risk of slavery and human trafficking because all employees are sourced from within the United Kingdom through employment centres, and from other companies working in the same industry as our company and the organisation do not carry out direct imports any goods or services.

G) STEPS

At this time, no steps have been taken to confirm the existence of slavery or trafficking however this statement provides a starting point, from which we will build our foundation to compliance.

James Hargreaves Group does however, consider its exposure to slavery or human trafficking to be very limited; *nonetheless*, it aims to identify and mitigate risk in the following ways:

- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.
- Our organisation is not tied to any contracts with our own supply chains, therefore we can and will exercise termination powers with immediate effect should we suspect that any supplier is involved in Modern slavery.
- Where appropriate, we will include reference to the Modern Slavery and Human Trafficking Act 2015 in our policies and procedures and ensure our Safeguarding training gives guidance to staff on the identification and reporting of modern slavery or human trafficking.

J) SLAVERY COMPLIANCE OFFICER

All concerns regarding modern slavery should be addressed to a company director, who will then undertake relevant action with regard to the **James Hargreaves Group** obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed within 6 months of our financial year end (31 December)

Signed



Date 05 April 2019

Operations Director
