

Slavery and Human Trafficking Statement for Financial Year Ending 31/03/2019

This statement is made pursuant to Part 6 Section 54 of the Modern Slavery Act 2015. It sets out the actions taken by Lathams Ltd during the financial year above to ensure that slavery and human trafficking is not taking place in any part of its supply chains and any part of its own business.

James Latham organisational structure and business

Lathams Ltd is the trading subsidiary of James Latham PLC with 11 trading offices operating from 10 sites located in Dudley, Fareham, Gateshead, Hemel Hempstead, Leeds, Purfleet, Scotland, Thurrock, Leicester and Yate. The company specialises in the import and distribution of timber and panel products, supplying the joinery and furniture industries.

Supply chain, risk assessment and due diligence process

In terms of product procurement, the company's supply chains are international in their scope and the risks associated with these are managed and mitigated through extensive risk assessment to ensure compliance with the EUTR.

Regarding directly employed staff, the company fully complies with all HR legislation. Where temporary staff is employed, these are recruited through reputable agencies typically for skilled activities which are considered low risk.

Credentials of new stock, overhead suppliers and contractors are vetted by an evaluation questionnaire including criteria regarding ethical policies, liability insurance, and availability of a Modern Slavery statement. This also requires the supplier to make a written declaration that they commit to respect and protect human rights of all workers involved in the provision of services, product manufacture and supply.

Cleaning companies have been identified as suppliers with potential risk due to the lower skill and pay of workers and these activities being performed outside of Lathams' normal working hours. Risk is considered low but further mitigation measures have been considered in the planned actions for 2019/2020.

Measuring effectiveness

Certification and verification schemes are used as the key mitigation factor for procurement of products in countries where the risk of modern slavery and human trafficking is identified as high. Monitoring environmental performance of our procurement in those countries will be the indicator of effectiveness. To increase the robustness and effectiveness of our systems, Lathams stays actively engaged with certification schemes and trade associations: this is to make sure we are sensitive to any market alerts via illegality reports so we can continuously review the level of compliance and effectiveness of associated certification schemes.

In addition, supplier visits are used to detect and monitor that good Chain of Custody and quality, environmental and health and safety processes (such as ISO) are in place; more robust control systems indicate the tightest level of control over modern slavery.

Policies in relation to slavery and trafficking

These are foremost encompassed within the Environmental and Ethical Policy (dated 12/12/2017) which details the company's commitments to supply chain transparency. This policy is subject to regular review as part of the company's ISO 14001 environmental management system certification. Supply chain management and traceability is also an integral part of the company's ISO 9001 quality management system, FSC® and PEFC™

Chain of Custody certifications. In addition, the principles of the Modern Slavery Act are also embedded within the Anti-Discrimination Policy, Bribery Policy, Harassment and Bullying Policy, Pay Policy, and Whistleblowing Policy.

Training about slavery and human trafficking

As specified within our Environmental and Ethical Policy, staff will be provided with training so that they recognise the impacts associated with their activities and their role in managing these, as well as understanding the risks of modern slavery and human trafficking within supply chains and the business. It is expected from every employee to report any concerns and management is committed to acting upon these using the routes of communication detailed within our Whistleblowing Policy.

Planned actions for 2019/2020

- Continued training for staff to assist in the recognition of modern slavery and human trafficking.
- Continued development and enforcement of procurement policies and supplier reviews to ensure there is no slavery or human trafficking within supply chains.
- Modern Slavery Act training to be part of contractors check list for cleaning companies.
- Establish Whistleblowing communication routes and ensure these are available to external parties including suppliers, customers.

Statement was approved by Board of Directors 15/08/2019

Signed



Nick Latham – Chairman, Lathams Ltd
27/09/2019