


POL No.: 002	Title: Modern Slavery Policy	
Issue: a		
Created by: Daiva Praneviciene		
Issued by: <i>Daiva Praneviciene</i>		

HAMBLESIDE DANELAW LTD COMMITMENT TO THE PRINCIPLES OF THE MODERN SLAVERY ACT 2015

Hambleside Danelaw Ltd acknowledges its responsibilities in relation to the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own businesses and in its supply chains.

The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

Hambleside Danelaw Ltd does not have a turnover of above £36 million, hence it is not required to publish an annual modern slavery statement. However, as a conscientious company, Hambleside Danelaw Ltd takes a step further than needed to prevent modern slavery in its business and supply chains. It is the duty of the Board of Directors to ensure that this Policy is upheld, and necessary finances and personnel where required provided.

The Organization has zero tolerance policy towards modern slavery and does not enter into business with any other organisations, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

Hambleside Danelaw strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

ABOUT HAMBLESIDE DANELAW LTD

Hambleside Danelaw's building products story began in 1975, when an investment opportunity presented itself in the form of a patent for an innovative glass reinforced polyester (GRP) roofing product. A year later, Hambleside Manufacturing Limited was established; to formally produce and market the GRP products.

After diversifying into rooflights and cladding, in 1983 the Organisation began manufacturing valley gutters for a Daventry-based new client, Danelaw Laminates Limited. Having worked closely for several years, discussions on a merger took place between the two companies, and a deal was done in 1992. Subsequently, Hambleside Danelaw was born.

Today, Hambleside Danelaw Ltd manufacture a range of pioneering and innovative GRP products on its sophisticated continuous profiling production lines. Products conceived in Britain, made in Britain.

The products are manufactured using a range of raw materials, including glass rovings and mats, varying fire resistant and retardant resins and pigments. In addition, factory operates vacuum-forming and injection moulding machinery capable of producing products with shot weights up to 1400 grams, of which most products form part of our Pitched Roofing range.

Throughout Hambleside Danelaw Ltd history the Organisation have led the way in the industry, accommodating legislative and regulatory changes within its product designs and keeping abreast of BS EN ISO standards.

- ✔ Danelaw has an expansive product range catering to a myriad of Pitched Roofing needs and even to cavity, and underfloor demands. The range of pitched roofing products extends from the top to the bottom of the roof- from ridge & hip systems to bonding gutters®, and below the surface via roofing underlays.
- ✔ Hambleside Danelaw Ltd have been manufacturing GRP rooflights in the UK for over 45 years. Our brand, Zenon®, is the market leader in developing environmentally conscious solutions to improve building energy performance, while reducing the carbon footprint through the efficient and effective use of daylight. The GRP rooflights can be used in industrial, agricultural, and commercial buildings.
- ✔ Hambleside Danelaw's Dryseal is a single ply roofing system which is suitable for low pitched and 'flat' roofing. Comprising pre-cured GRP components, Dryseal is far more versatile and durable than many commonly used 'wet lay' systems.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING


The following policies are available to all staff through the Employee Handbook and BMS system:

- ✔ Corporate Social Responsibility
- ✔ Anti-Harassment & Bullying
- ✔ Equality and Diversity Policy
- ✔ Anti-Corruption & Bribery

DEFINITIONS

Hambleside Danelaw Ltd 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.

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- ✔ 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.

POTENTIAL EXPOSURE

Hambleside Danelaw Ltd considers its main exposure to the risk of slavery and human trafficking to exist within the activities of the suppliers and their raw materials. This is because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be extremely low. Hambleside Danelaw Ltd taken steps to ensure that such practices do not take place in its business nor the business of any other organisations that supplies goods and/or services to it.

SUPPLY CHAIN

Hambleside Danelaw Ltd have long-term relationships with the majority of its suppliers of both finished products and raw materials both in the UK and overseas.

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited, and we procure goods and services from a restricted range of UK and overseas suppliers, mainly through UK government frameworks.

RISK ASSESSMENT AND MANAGEMENT

Hambleside Danelaw Ltd carries out due diligence process in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- ✔ Review suppliers on a regular basis, contacting them if the supplier is, or is suspected, to be involved in modern slavery.
- ✔ Undertake impact assessment of its services upon potential instances of slavery.
- ✔ Follow action plan to address risk to modern slavery.
- ✔ Ensure clear actions taken to embed a zero-tolerance policy towards modern slavery.

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

Hambleside Danelaw Ltd have set following key performance indicator to measure its effectiveness in ensuring modern slavery or people trafficking is not taking place in the Organization or its supply chains:

- ✔ Employees are encouraged to report on any potential failings when following the steps to prevent modern slavery. Reports will be recorded and investigated.

TRAINING ON MODERN SLAVERY AND HUMAN TRAFFICING

Hambleside Danelaw Ltd provide the following training to staff to effectively implement its stance on modern slavery through the Employee Handbook and other above-listed Policies. All employees are made aware of Hambleside Danelaw Ltd policies relating to standards of behaviour that it requires from them.

Full Name: CHRISTOPHER AVERY

Position: DIRECTOR

Signature: *CP Avery* Date: 08/08/2023

Revision History		
Date	Issue	Comments
03Aug23	a	First Issue