

FOCCHI LTD - SLAVERY STATEMENT

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 Focchi 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. Focchi 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

Focchi Ltd is owned by the Parent Company Focchi SpA in Italy, which is fully owned by the Focchi family. We are engaged in the full cladding process from design, through to manufacture, delivery and site installation.

Our High Risk Areas

The following activities are considered to be at risk of modern slavery within Focchi Ltd and the list will be reviewed and updated from time to time:

- Use of staff by sub-contractors or suppliers to Focchi Ltd, where the suppliers' processes are not compliant
- Employment of sub-consultants, suppliers and sub-contractors by Focchi Ltd, where their work practices may be non-compliant

Our Policies

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

- Equal Opportunities Policy. Focchi Ltd is fully committed to ensuring that equal opportunities policies are implemented and maintained. All terms and conditions of service apply on a fair and consistent basis to every member of staff.
- Ethical Policy. Focchi Ltd operates to the highest professional and ethical business standards by both our own employees and all associated persons (consultants, freelancers, contractors, sub-contractors, suppliers, agents, subsidiary or connected companies etc.) Focchi Ltd takes a zero-tolerance approach to bribery, fraud and corruption.
- Code of Conduct. This code explains the manner in which Focchi Ltd behaves as an organisation and how we expect our employees and suppliers to act.
- Corporate Social Responsibility Policy. Focchi Ltd has long practised strong corporate governance guidelines and we continue to advocate corporate responsibility in every facet of our business on a daily basis.

Our Subcontractors & Suppliers

Focchi Ltd operates a supplier policy and maintains a preferred subcontractor/supplier list. To ensure all those in our supply chain and subcontractors comply with our values we conduct due diligence on all subcontractors and suppliers before allowing them to become a preferred supplier, this includes completing an anti-slavery risk assessment.

Focchi Ltd.

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Focchi Ltd's anti-slavery policy forms part of our contract with all subcontractors/suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Focchi Ltd is committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers who share our values

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains, Focchi Ltd intend to roll out a training programme to our staff. All staff will be encouraged to attend training in this area to better understand the risks. We have made all Staff aware of the Modern Slavery Helpline on 0800 0121 700. This will allow anyone who thinks they may have come across an instance of modern slavery to call for more information and guidance on what to do next.

Our Performance Indicators

Focchi Ltd 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.

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