



Modern Slavery Policy

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Policy Updates

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Introduction

The National Timber Group is committed to understanding modern slavery risks and to ensuring that there is no modern slavery in our own business or in any part of our supply chain.

Modern slavery can take various forms, such as, servitude, forced or compulsory labour and human trafficking.

Our aim is to do the right thing, and we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we take a zero-tolerance approach to non-compliance of the Modern Slavery Act 2015.

This commitment applies to all colleagues where they are acting on behalf of NTG, whether engaged on a permanent or temporary basis as an employee and in addition to any external contractors, agency workers or third parties. Including

- Employees
- Directors
- Officers
- Agency workers
- Volunteers
- Agents
- Contractors
- Consultants
- Business partners

Modern Slavery - is the term used within the UK and is defined within the Modern Slavery Act 2015. Crimes include holding a person in a position of slavery, servitude forced or compulsory labour or facilitating their travel with the intention of exploiting them soon after.

Human Trafficking - is modern day slavery and involves the use of force, fraud, or coercion to obtain some type of labour or commercial sex act. Traffickers use force, fraud, or coercion to lure their victims and force them into labour or commercial sexual exploitation.

Our Business

Our Group Company is National Timber Group Midco Limited (Registered Number 10887323), and we are the largest independent added-value timber distribution and processing group in the UK. The Group was created through the acquisitions of market-leading brands and currently consists of National Timber Group Scotland Limited (Registered Number SC080045), and National Timber Group England Limited. (Registered Number 10608445).

The Group serves a diverse customer base including joiners, housebuilders, and contractors, and is a favoured supplier of large-scale infrastructure projects. With extensive warehousing, processing, and distribution capabilities the Group can provide customers across the UK with a full range of the highest quality timber, panel, decorative surfaces, and engineered wood products supported by comprehensive timber knowledge and expertise.

In 2023, the Group had a combined turnover in the region of £300million. Currently we employ around 1200 employees across 47 processing and distribution sites, from the North of Scotland to London and the South-West of England.

Supply Chain Management

We have more than 150 key suppliers supporting our UK business, and these are mainly (70%) based in the UK.

We work with a wide range of different suppliers and partners. Some of our suppliers subcontract work or rely on recruitment agencies to supply temporary or permanent staff. By the nature of their businesses, certain suppliers are potentially at higher risk than others, for example, where we procure materials from outside the European Union.

Most of the materials we purchase are from a domestic source but nearly all the materials we buy are certified by one of the two main certification bodies for sustainable timber – FSC and PEFC. These organisations are two of the largest forest certification schemes in the world and they exist to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

Within our procurement process, our Chain of Custody procedures ensure that we adopt a due diligence approach when purchasing timber materials. This adherence to the UK Timber Regulations, informs how we review and measure our suppliers. We inform our suppliers that they must meet the appropriate standards in relation to UKTR due diligence requirements. We always look to work with suppliers that behave ethically and act as good citizens, whilst adhering to the appropriate industry and legal requirements in the place in which they conduct their business.

All suppliers who provide goods or services to the Group must undergo due diligence to ensure satisfaction the 3rd party is genuine and one which we can trust.

Relevant Policies

National Timber Groups operates several policies that help to mitigate the risk of modern slavery and human trafficking. There are processes in place where any issues or concerns regarding modern slavery or human trafficking can be raised confidentially and protection is given to any “whistleblowers”.

Some of the relevant policy documents are as follows. These are reviewed annually:

- Whistleblowing
- Right to Work
- Bribery & Corruption
- Equal Opportunity

Our People

We recognise that the risk of modern slavery and human trafficking is less in our own business than in our supply chain.

We ensure that all Group companies conduct face to face checks to check and copy original documentation to confirm an employee's right to work in the UK.

We also ensure that when we have new recruits that their bank account details match the employees name and that they provide a legitimate and recognised national insurance number. If there are any discrepancies identified the matter is elevated to a senior member of the HR team for evaluation.

Our Journey

As a business we understand the risks of modern slavery and human trafficking and believe that we can improve the processes within our company to mitigate the risk of modern slavery and human trafficking occurring in our supply chain.

We are committed to improving our processes and the following steps have been taken:

- We have a Right to Work checking process across all our businesses to ensure that there is consistency and to eliminate any risks of illegal working.
- We are reviewing our Pre-Qualification Questionnaire (PQQ) to adopt a more robust set of questions in relation to modern slavery and human trafficking so we can understand the approach taken by our suppliers. The responses given in the PQQ document are reviewed by the Group procurement team.


Staff awareness is an area that we focus on, and we ensure that all employees are aware of our Modern Slavery and Human Trafficking Policy, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

Declaration

The National Timber Group Executive Board members will work together to further the commitment to eliminate modern slavery and human trafficking which will help to ensure that human rights are being respected across our workforce and supply chains.

This statement has been approved by the National Timber Group Chief Executive Officer and the Group Board of Directors and it will be reviewed and updated annually.

This is a policy of National Timber Group, covering National Timber Group Midco Limited and its subsidiary companies: National Timber Group England Limited, National Timber Group Scotland Limited, Glow Insulation & Site Supplies Limited and Scotia Roofing & Building Supplies Limited.

Signed	
Name, Position	Emma Cunningham, Interim CEO