

forest Garden Group

Modern Slavery Statement

Modern Slavery Act 2015 Statement Financial year - 1st April 2021 to 31st March 2022

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that Forest Garden Group has taken to prevent slavery and human trafficking from taking place in our supply chains or in any part of the business.

About Forest Garden Group

Forest Garden was founded in 1974 with the aim of supplying high quality timber products to the UK garden market. Today they are the UK's largest producer and distributor of timber garden products. The timber is sourced from the United Kingdom (UK) and products sold via many different household branded suppliers. The Forest Garden Group has an annual turnover in excess of £90 million

Forest Garden Group supplies products throughout the year, however there is a peak in the business between March and May where Forest Garden Group employs roughly 650 staff across its Group sites and distribution network, as well as relying on a large number of agency workers, especially during our peak season. Labour that is supplied by Labour Providers are mainly migrant workers.

Forest Garden are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Modern Slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships by implementing and enforcing effective systems and controls to combat and prevent Modern Slavery.

We expect our Labour Providers to have in place a robust system of recruitment that identifies the source of the employee. We also expect that awareness training that includes the 'signs and triggers' of Modern Slavery to be delivered to all key staff in the recruitment process.

Supply Chain

Forest brand has its heritage in retail garden centres and has long been synonymous with high-quality garden products. Today, our range can be found in many garden centres, building centres and supermarkets throughout the UK.

We want our customers to be confident that our business partners and in particular our suppliers treat their employees as fairly as we treat our own employees. Imported products sourced from outside the UK or EEC are potentially more at risk of slavery or human trafficking issues, and we focus our efforts accordingly. Where possible we have built long standing relationships with our suppliers and we make very clear our expectations of business behaviour, engaging only those suppliers that uphold the same principles as ourselves. In the event that suppliers fail to take steps to cease or prevent adverse human rights impacts, Forest will terminate its business relationships with those suppliers.

Due Diligence

As part of our robust initiative to identify and mitigate any risk of Modern Slavery in our business, we are carrying out due diligence on suppliers in high-risk areas and have developed robust methods for effective assessment and auditing of our supply chain.

Where risk assessment identifies risk the following will happen:

Level of Risk identified in risk assessment	Action
HIGH	Consideration will be given to reducing the supply from the company and in the worst-case scenario seek to cease the contract.
MEDIUM	An action plan will be agreed and Forest Garden will work in collaboration with their suppliers to minimise the risk

We meet and talk with all our Labour Providers on a regular basis to ensure they are aligned with our values and vision in respect of ethics. We stipulate that they train all their staff on specific training relating to Modern Slavery.

We continue to require a basic English language requirement whereby agency workers must pass a basic numeracy and literacy test. A basic level of English has been set to be attained by all our workforce in a reasonable period of time to facilitate better communication, social and workplace integration and the best defence against potential exploitation.

Our in-house Forest Freedom anti-slavery project began in 2017. As well as training and a poster campaign we have installed a confidential phone line for employees to report any concerns or issues they may have



Policies

As well as a modern slavery policy a number of other policies are in place

- **Ethical Trading Code of Conduct Policy** which outlines requirements which all business associates must uphold in relation to their own employees and throughout their own supply. The code includes requirements that employment is freely chosen, child labour shall not be used, freedom of association and no harsh or inhumane treatment shall occur.
- **Migrant Working Policy** This is specifically intended to protect workers who may be potentially vulnerable to exploitation in the course of international migration. The policy contains requirements including but not limited to, the withholding of passports and similar documents and the levying of recruitment fees.
- **Responsible Sourcing Policy** reinforces our commitment of working together with our suppliers towards a long-term, sustainable and successful future for all parties

Training

Working with Hope for Justice/Slave Free Alliance we have delivered Moderns Slavery Awareness training to our Board Members, Management Teams, Supervisors and all staff in key positions.

Modern Slavery awareness features heavily in all company inductions and we are working with Hope for Justice and the Slave Free Alliance, who are training our internal auditors.

We will continue to train key front line staff on best practice and also in response to any changes in law. Our labour providers will be invited to attend training so they can continually improve their competency by achieving the same standards we strive for and expect.

Steps taken over the last year

We have identified that the risk to our business comes from our supply chains. Namely the supply of temporary labour through our approved labour providers, especially during our peak season and secondly, through our suppliers of product from Eastern Europe.

Labour Providers

Over the last year we have completed the unannounced audits at the offices of our main Tier-1 labour providers. These audits have been completed as a joint effort between ourselves and the Slave Free Alliance. The audit process has proven very beneficial for our business and our Labour Providers. We have been given the confidence that the labour providers are completing their own checks and operating with a level of competency that does not pose a risk to our business. Any areas of improvement have been minor and we now consider it best practice to work with our labour providers to ensure compliance. We offer their account managers the opportunity to join in with training sessions held at our sites.

We continue to have a good working relationship with labour providers and our due diligence process for any new labour provider includes:

- ✓ Slavery standards to be discussed in the Service Level Agreement and follow up review meetings (on the agenda)
- ✓ Training and Sign off from the Group Risk Department
- ✓ Full induction
- ✓ Strict paperwork expectancies set out

Suppliers

Our Import Supply Chain Manager has been trained by Hope for Justice in modern slavery audits and ethical checks continue to play a large part in supplier site audits.

Other actions:

- ✓ We have added to our audits the ETI Base Code (Ethical Trading)
- ✓ We are Sedex Members – which means our audits follow Ethical Trade Audit (SMETA) Best Practice Guidance
- ✓ Our import supply chain manager is trained as a Social Systems (SMETA) Auditor
- ✓ We have an ongoing audit schedule of supplier's factories



Other actions

- i. We continue to work on closing off actions from our Slave Free Alliance gap analysis.
- ii. We continue to have a Senior Steering Group chaired by our CEO as well as 2 x other modern slavery action groups. One focuses on the supply of people and the other on the control of our suppliers of products, good and services.
- iii. We continue to run a number of in-house checks on agency and permanent staff at site. This includes routine address checks, bank account checks and also agency worker interviews using Slave Free Alliance/Hope for Justice trained in-house staff. Any issues would be shared with Slave Free Alliance if required.
- iv. Every agency worker has to have a CV/work history and we use a photo identification document to ensure the worker who turns up is the person the documents match. We will not accept a new worker without this documentation.
- v. We have trained new Tier-1 Labour providers at our Hartlebury and Lockerbie sites.
- vi. We continue to update our SAQ questionnaire on the SEDEX website
- vii. We support the Slave Free Alliance's anti-slavery day on the 18th October 2021 and will use their provided posters at our sites as well as offering them to our approved labour providers.
- viii. Our confidential reporting line is still in place and posters across all sites.

Upcoming actions of the coming year

We have a number of actions coming up over the next year as we continue to ensure our ongoing compliance with the Modern Slavery Act and other moral, ethical and legal obligations. These include:

- i. Further training for our Senior Board from Slave Free Alliance on updates to modern slavery compliance
- ii. Refresher training for our key front-line staff as well as training new staff – including Heads of Department, Line Managers, Team Leaders and other selected staff
- iii. Inviting the account managers of our Tier-1 Labour providers to training sessions to share our best practice and expectations with Modern Slavery compliance
- iv. Further unannounced audits of any new Tier-1 Labour providers and also throughout our Product and Services Supply Chain
- v. Working with our European Suppliers to ensure they meet our approved standards of Modern Slavery Compliance
- vi. Creation of a Supplier Chain Code of Conduct
- vii. Refresh of our Forest Freedom poster campaign
- viii. Continued in-house checks and audits
- ix. Key documents continue to be translated with the ongoing plan that key documents such as contracts will be provided in a worker's native language.
- x. Refresh of our Service Level Agreements ensuring our stance on Modern Slavery standards is met as well as regular review meetings with our labour providers

External Partnerships and Continuous Improvement Initiatives

- i. We originally partnered with Hope for Justice, an anti-slavery organisation in early 2017. They will continue to assist with providing Modern Slavery training, and work with us to carry out risk assessments of our supply chains and provide a pathway for any victim of Modern Slavery that requires support and assistance.
- ii. We provide support to Hope for Justice to ensure that other businesses and organisations can learn from our practices. The objective is to encourage greater collaboration between the parties facing this issue and to build an intelligence and knowledge sharing cohort.
- iii. We are now proud members of the Slave Free Alliance and the works they complete
- iv. We share our ethical audits with customers and suppliers to work towards a greater transparency on our supply chains.
- v. We will continue to work closely with our Labour Providers to ensure best practice and identify any issues together
- vi. Slavery topics to continue to form part of our key performance indicators with service level agreements of our suppliers of labour, product, goods and services

Signed on Behalf of Forest Garden Group:



Guy Grainger

Group CEO

Date: 1st April 2021

Review Date: 31st March 2022

