



EGL Group



Modern Slavery and Human Trafficking Statement 2018-19

The UK Modern Slavery Act 2015 includes a requirement for large businesses to publicly report on the steps taken each financial year to combat slavery in its own business, and in its supply chains. As required by section 54 of that Act, this statement sets out the steps taken by the EGL Group during the financial year ending 31st March 2019.

The EGL Group Business Activity and Structure

The parent company of the EGL Group is Empress Garland Ltd (04881251) which consists of three privately owned trading companies – EGL Homecare Ltd (company number 01416097) based in Shoeburyness, Essex, UK, Ramon Holdings Ltd T/A Ramon Hygiene Products (05933693) based in Leicester, UK and EGL Coral based in Leszno, Poland (50% ownership).

The main business activity of the EGL Group is the manufacture and distribution of a wide range of cleaning products for use in the home and within the janitorial, catering and professional cleaning industries.

EGL Group Modern Slavery Position Statement

The EGL Group strongly opposes any form of modern slavery and it is committed to ensuring there is no modern slavery and human trafficking in any part of its business or in its supply chain.

EGL Group Modern Slavery Strategy and Policies

The UK sites are fully committed to a pro-active approach to preventing modern slavery and hidden labour exploitation based on the S2G strategy (www.stronger2gether.org). S2G is a UK based, business led, multi-stakeholder initiative whose purpose is to support organisations to tackle modern slavery within their businesses and supply chains. S2G provide guidance and resources to help UK based employers and their labour providers work together to reduce exploitation.

In line with the S2G strategy, the UK sites are committed to implementation of the “Preventing Hidden Labour Exploitation” Policy. The Policy commitments are as follows:

1. Designate appropriate managers to attend appropriate training and to have responsibility for developing and operating company procedures relevant to this issue.
2. Accept that job finding fees are a business cost and not allow these to be paid by job applicants. The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
3. Ensure that all staff responsible for directly recruiting workers are aware of the issues around third party labour exploitation, the signs to look for and they have signed appropriate Compliance Principles.
4. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members.
5. Adopt a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
6. Provide information on tackling “Hidden Labour Exploitation” to our workforce through a variety of formats such as workplace posters, worker leaflets, induction and other training.

7. Encourage workers to report cases of hidden third party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
8. Positively encourage and support employees and agency workers to report such exploitation which may be occurring within their communities.
9. Require labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above.

Code of Conduct for Ethical Trade

Underpinning the S2G strategy, all sites in the EGL Group work to a Code of Conduct for Ethical Trading aligned with the Ethical Trading Initiative Base Code (www.ethicaltrade.org/eti-base-code), derived from the Core Conventions of the International Labour Organisation and the United Nations Universal Declaration of Human Rights, which clearly states the position of the group on modern slavery issues.

To ensure internal compliance with the Code of Conduct, each site in the EGL Group has an external independent, 3rd party Sedex Members Ethical Trade Audit (SMETA) every two years which includes confidential worker interviews and a thorough review of relevant documentation. Ethical audit reports are shared with major trade customers via Sedex.

Other Policies

In addition to the Code of Conduct for Ethical Trade and the Preventing Hidden Labour Exploitation Policy, the UK sites also adhere to the following policies:

- Business Ethics Policy
- Anti-Bribery Policy
- Confidential Reporting / Whistleblowing Policy
- Harassment and Bullying At Work Policy
- Equal Opportunities Policy
- Freedom of Association Policy
- Grievance Policy

Sedex (Supplier Ethical Data Exchange).

Each site in the Group is also a member of Sedex, the world's largest non-profit, web based collaborative platform for sharing responsible sourcing data on supply chains. Sedex is used by more than 38,000 members in over 150 countries to manage their own business and their supply chains, on issues such as labour rights, health & safety, the environment and business ethics.

The EGL Group Supply Chain

A variety of products, raw materials and packaging are sourced from both national and international suppliers located worldwide including in Europe, Asia, and the Far East.

The EGL Group will actively seek to develop long-term trading partnerships with first tier suppliers who take the following actions:

- Adopt the ETI Base Code or a similar Code of Conduct for Ethical Trade that clearly states their position on Modern Slavery issues.
- Work towards meeting the minimum standards of either their own Code of Conduct or the EGL Group Code of Conduct within appropriate agreed timescales.
- Seek to develop long-term trading partnerships with their own suppliers, agent(s), labour providers and subcontractors who have also implemented a Code of Conduct for Ethical Trade and who meet these minimum standards.
- Register with Sedex and complete the Sedex self-assessment questionnaire.

Thereafter the EGL Group UK sites use several tools including the Sedex Self-Assessment Questionnaire (SAQ), the Sedex Guidance on Operational Practice and Indicators of Forced Labour, Sedex Supplier Risk Assessment tool, the ETI website, the Global Slavery Index, UK Government Overseas Business Risk reports and EGL Group Supplier Questionnaires to risk assess each supplier prior to award of business and then on a regular basis once a trading relationship is established.

All first tier and some second tier suppliers are asked to provide a copy of an approved independent third party ethical audit report conducted within the last 12 months against an approved Code of Conduct covering Modern Slavery issues such as Forced and Bonded labour, Freedom of Association, Child Labour, Living Wages, Working Hours, etc. Thereafter, high risk suppliers are asked to provide audit reports every 12 months, medium risk suppliers every 24 months.

In order to improve working conditions at suppliers, EGL Group have a continuous improvement approach. Therefore, if violations of the Code of Conduct are identified, the EGL Group work with suppliers to help them resolve those issues within a sensible time frame. However, if serious violations of the Code of Conduct are identified and the supplier is unable or unwilling to resolve those issues it will lead to termination of the business relationship.

The EGL Group UK sites have continued to raise awareness of the UK Modern Slavery Act and encourage UK based suppliers and their labour providers to attend the S2G “Tackling Modern Slavery in UK Businesses & Supply Chains Workshop”.

Suppliers of finished products and raw materials are asked to accept in writing contractual trading terms which includes a clause on compliance with the Modern Slavery Act. They are also asked to provide annually, a signed policy declaration confirming compliance with the EGL Group Code of Conduct, Business Ethics Policy and Anti-Bribery Policy.

The EGL Group believes that the risk of Modern Slavery taking place in its own business or at first tier suppliers is mitigated as a result of clearly established standards, methods of oversight and the controls being applied throughout its sourcing process and dealings with those suppliers. Whilst progress continues to be made, the EGL Group also recognises that there remains a risk of Modern Slavery taking place much further down the supply chain beyond 2nd or 3rd tier where it does not currently have the visibility required, particularly in relation to well documented high risk countries and industries.

This statement was approved by the EGL Group Board on 30th September 2019

This statement has been signed on behalf of the board by:

A handwritten signature in black ink, appearing to read 'Terry Dearlove', with a long horizontal flourish extending to the right.

Terry Dearlove

EGL Group Managing Director

30th September 2019