



EGL Group



Modern Slavery and Human Trafficking Statement 2019-20

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 2020.

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 – (1) EGL Homecare Ltd (company number 01416097) which employs around 270 employees and is based in Shoeburyness, Essex, UK (2) Ramon Holdings Ltd T/A Ramon Hygiene Products (05933693) which employs around 90 people and is based in Leicester, UK and (3) EGL Coral based in Leszno, Poland (50% ownership) which employs around 50 people.

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. Customers of the two UK sites include retailers, wholesalers and b2b distributors predominantly based in the UK whereas EGL Coral serves retail and wholesale customers that are primarily based in Poland and other Eastern European countries.

EGL Group Modern Slavery Position Statement

The EGL Group recognises the responsibility it shares with its suppliers to buy, manufacture and sell products in an ethical manner. The EGL Group want customers to be confident that the people who make their products are treated fairly with respect for basic human rights, they are kept safe and free from exploitation and that they are not exposed to unsafe working conditions.

Modern Slavery is an abhorrent crime that exists in every part of the world, even the UK where it is estimated there could be as many as 136,000 people in Modern Slavery. Modern Slavery takes many forms including Human Trafficking, Bonded Labour and Sexual Exploitation. Forced Labour is the most common form of Modern Slavery in the UK.

The EGL Group strongly opposes any form of Modern Slavery and recognises its responsibility to not only understand the risks of Modern Slavery occurring in its business and in its supply chains but also to take practical steps to mitigate those risks.

Assessing Risk

The EGL Group uses various sources and tools to understand Modern Slavery Risks in its own business and in its supply chain including the “Stronger Together” initiative resources (www.stronger2gether.org), various Sedex tools such as the Self Assessment Questionnaires, Risk Assessment Tool and the Guidance Report on Operational Practice and Indicators of Forced Labour, The Walk Free Foundation Global Slavery Index (<https://www.globalslaveryindex.org/>), Anti-Slavery International (<https://www.antislavery.org/>), Ethical Trading Initiative (<https://www.ethicaltrade.org/>) and UK Government Overseas Business Risk reports.

The EGL Group understands the potential risk of Modern Slavery taking place in its own business and believes that risk is mitigated through its current Modern Slavery strategy, policies and procedures.

The EGL Group has a documented Supplier Evaluation Procedure for current and potential suppliers that includes an Ethical Risk Assessment using the various sources and tools mentioned above to assess each supplier prior to award of business and then on a regular basis once a trading relationship is established.

The Group therefore believes as a result of these clearly established procedures, methods of oversight and the controls being applied throughout its sourcing process the risk of modern slavery occurring in first tier suppliers is also mitigated. However, The Group recognises that there remains a risk of Modern Slavery taking place further down the supply chain beyond 2nd or 3rd tier where it does not currently have visibility, particularly in relation to high risk countries and industries.

Mitigating Risk - EGL Group Modern Slavery Strategy

“Stronger Together” (S2G) is a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third party exploitation of workers. It provides guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation. The EGL Group UK sites are fully committed to implementation of the S2G strategy.

The EGL Group understands that Modern Slavery issues can only be effectively mitigated if employers and their labour providers both understand Modern Slavery issues and work in partnership on these issues with a co-ordinated approach. The Group therefore choose to work with labour providers who are also committed to implementation of the Stronger Together strategy and the current labour providers are Stronger Together business partners.

Policies

The EGL Group has established various policies in its business to help its employees and suppliers understand how to mitigate the risks of modern slavery in its own business and in its supply chain. These policies demonstrate a clear commitment to this issue and ensure that appropriate and coordinated action is taken throughout the business.

Code of Conduct for Ethical Trade

The EGL Group Code of Conduct for Ethical Trade (“The Code”) is a framework of 12 principals adopted by the business and is based in part on the Ethical Trading Initiative (ETI) Base Code of labour practice (www.ethicaltrade.org/eti-base-code), which is in turn based on the standards of the International Labour Organisation (ILO). The 12 principals covered by “The Code” are as follows:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed
10. Entitlement to Work
11. Labour Providers
12. Protection of the Environment

The EGL Group choose to hold themselves accountable to the minimum standards of “The Code”, therefore every two years each site in the EGL Group has an independent, 3rd party Sedex Members Ethical Trade Audit (SMETA). SMETA uses the ETI Base Code and the local law as its monitoring standards and includes a site tour, confidential worker interviews and a thorough review of documentation.

The EGL Group sites are fully committed to openness and transparency and are therefore pleased to share the full audit reports with our trade customers via Sedex. Ramon Hygiene had a SMETA audit in January 2020. EGL Homecare are due to have their next audit October 20 and EGL Coral in February 21.

Sedex (Supplier Ethical Data Exchange).

Each site in the Group is a member of Sedex one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains. Sedex provides an online platform, tools and services to help businesses operate responsibly and sustainably, protect workers and source ethically. The EGL Group require that Labour Providers are also Sedex members.

Preventing Hidden Labour Exploitation Policy

The EGL Group UK sites continue to work to the policy commitments included in the group "Preventing Hidden Labour Exploitation" Policy which 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.

Other Policies and Procedures

The UK sites also adhere to the following policies and procedures which all contribute to mitigation of Modern Slavery issues:

- Eligibility to Work Procedure – this ensures everyone who works with us has a legal right to work in the UK and has not therefore been trafficked into the UK with no legal right to work.
- 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

The EGL Group Supply Chain

Products, raw materials and packaging are sourced from suppliers located in different countries including: Austria, Belgium, China, France, Germany, Ireland, Israel, Italy, Netherlands, Pakistan, Poland, Spain, Sri Lanka, United Kingdom, United States.

The EGL Group continue to 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 and work towards meeting the minimum standards of that Code 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 (SAQ).

Where it is commercially viable, first tier suppliers and some second tier suppliers are asked to provide an approved independent third party ethical audit report conducted within the last 12 months against an approved ethical Code of Conduct covering Modern Slavery issues. 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, the 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”. To assist suppliers who are still at the early stages of their Ethical Trading journey and may be unfamiliar with Modern Slavery issues, the EGL Group have also published a Supplier Ethical Trading Guide.

In the last 12 months The Group identified the requirement for clarification of their position on supplier Sub-Contracting which clearly states that production and packing sites for products, raw materials and packaging supplied to the EGL Group must be approved by the EGL Group in writing before commencing supply. Permanent or temporary changes to production or packing sites must be disclosed to the EGL Group in advance and authorised by the EGL Group prior to any change. Unauthorised subcontracting is strictly prohibited. It is hoped strict adherence to this policy will ensure that the EGL Group continue to have full visibility of all workers in its first tier supply chain.

Suppliers of finished products and raw materials are asked to accept in writing contractual terms of trading which include a clause on compliance with the Modern Slavery Act. They are also asked to provide a signed policy declaration confirming compliance with relevant policies.

This statement was approved by the EGL Group Board on 31st August 2020

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



Terry Dearlove
EGL Group Managing Director
31st August 2020