



# Our modern slavery policy



## A message from our Chief Executive Officer

**At Customade Group, we recognise that we have a duty to trade responsibly, operate ethically and with integrity and fully comply with all applicable legislation and regulations.**

We aim to ensure that our workforce and those of our supply chain are treated in line with the employment laws of the UK and any other country in which the Group or its businesses operate.

We provide our procurement and HR personnel with appropriate training in the understanding of the broader issues of modern slavery to assist them in identifying areas of the business that may be at risk from inappropriate practices.

We take a great deal of pride in how our personnel react to such practices and their self-motivation to ensure modern slavery is never a part of the wider Group.

However, given recent times, whereby the UK has left the European Union and there is increasing focus on the migration of labour, we will never become complacent. We will always endeavour to ensure every one of our employees and those in our supply chains are treated with the respect they deserve.

In line with our values, we have adopted a Code of Conduct for our suppliers which we expect them and their supply chains to adhere to.

In summary, our business remains focused, vigilant, and committed to ensuring that we take all steps possible to safeguard our employees and those of our supply chain partners.

We will continue to ensure that the risk of modern slavery is never possible within the Customade Group and will continue to monitor our own practices as well as those of our suppliers.

**Will Gold - CEO**

## Our organisation

Customade Group brands specialise in the manufacture and distribution of a comprehensive range of home improvement products within the fenestration sector. Businesses within the Group provide aluminium and PVCu windows, doors i.e. bi-fold doors, patio doors and French doors, and roofing throughout the UK, operating from multiple manufacturing sites and distribution centres across the country. The Group comprises of the following legal entities:

- **Customade Group Services Limited**
- **Customade Limited**
- **Polyframe Limited**
- **Stevenswood Limited**
- **Virtuoso Doors Limited**

Our team of senior procurement and HR personnel continually draw upon the knowledge and expertise of other colleagues as required to ensure we are always helping one another to continuously evolve as individuals. We've created an environment where people can share ideas, where innovation and the future of our customers' businesses is key, and where people want to connect.

We are proud of our teams and work hard to ensure their safety and wellbeing, which includes a zero-tolerance policy towards modern slavery or human trafficking rights violations. We are committed to conducting our business ethically and responsibly, and ask the same practices of our suppliers, their supply chains, and associated businesses, to ensure they and their policies meet with the same high standards as ours. We will continue to focus our commitment to developing and improving our processes, improving our day-to-day behaviours, and maintaining compliance with the Modern Slavery Act.

We will ensure that our approach to modern slavery is incorporated, as appropriate, within such policies as:

- **Confidential Reporting (Whistleblowing) Policy**
- **Anti-Bribery and Corruption Policy**
- **Bullying and Harassment Policy**
- **Recruitment Policy**

"This statement highlights the action we have taken as a business to assess our operations and supply chain to mitigate any risk of slavery and human trafficking.

The statement relates to the financial year ended 31st December 2021, and is made pursuant to section 54(1) of the Modern Slavery Act 2015."





## Due diligence processes

Within the Customade Group, our recruitment and people management systems are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

The Group expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains;
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain;
- We take a risk-based approach to our contracting processes and keep them under review;
- We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties;
- We request that our suppliers confirm their compliance with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking; this may necessitate them obtaining third party's agreement to adhere to this code.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct;
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

## Parts of the business where there is a risk of slavery, and steps taken to assess and manage the risk

The Group has an extensive supply chain. 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, some of our suppliers are potentially at higher risk than others, for example, where we procure materials from outside the EU.

During last year, we began to develop our register of approved suppliers. Over the coming year, we will request that all suppliers confirm their adherence to our code of conduct. We will also continue to develop our policies to improve our own internal standards and to monitor our suppliers.

We understand that modern slavery involves the exploitation of vulnerable individuals for commercial gain, and that the widespread use of agency workers, and particularly migrant workers is a high-risk area. Within our own labour force, we have both migrant workers and agency workers.

We have identified that there is a potential risk that such workers may be victims of modern slavery and, to mitigate this risk, we will only use reputable employment agencies to source labour and, as part of our internal induction procedure, will audit to ensure that agency workers have a written contract of employment and have not had to pay any fees to obtain work.



### We aim to:

- Ensure that suppliers who provide us with agency or permanent staff confirm their adherence to our Code of Conduct.
- Contact suppliers in potentially higher risk categories to check what assurance arrangements they have in place.
- Revise our procurement strategy to include reference to modern slavery and human trafficking.
- Ensure our staff are aware that they can approach any member of the HR team or management if they have concerns about human trafficking or compliance with the Modern Slavery Act. In addition, we will communicate annually that the Whistleblowing policy is a tool for raising any potential concerns.

## Staff training

### We aim to:

- Make our staff aware of the Modern Slavery Act 2015, including the definitions of slavery and human trafficking.
- Tell staff what to do if they suspect a case of slavery or human trafficking.
- This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2021 and was approved by the Board of Directors on 19th May 2022.



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