

Modern slavery and human trafficking statement

Introduction

This statement sets out Better Bathroom's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

As part of the bathroom retail sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement covers the activities of Better Bathrooms:

Better Bathrooms was established in 2001 and is a UK-based Multi-Channel retailer of bathroom products. We are based near Manchester, and sell via our website (www.betterbathrooms.com), and 15 showrooms all across the UK.

What We Stand For:

Every day we strive to offer our customers **BETTER PRICES, BETTER CHOICE, and BETTER SERVICE.**

We cannot achieve our goals without the support of our suppliers. Our commitment and responsibilities to ensuring there are no forms of modern slavery in our supply chain are clear.

We are committed to ensuring that there is transparency in our own business and our approach to tackling modern slavery throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same standards from all our suppliers and business partners.

Better Bathrooms Ltd has taken the necessary steps to ensure that modern slavery does not take place within our supply chains and within our own business. We have robust hiring procedures and pre-employment checks.

Furthermore, as part of our contracting process, we have developed clauses outlining prohibitions against the use of forced or trafficked labour, or any person held in slavery or servitude.

In addition, and as part of our commitment we have taken the below further steps: -

- Created a Vendor manual for our suppliers containing a code of conduct which sets out the standards expected of our suppliers.
- Set our critical failures within the manual to cover child labour, forced labour and slavery. In the event of a Critical Failure, Better Bathrooms reserves the

right to cancel any current and / or future orders, without notice, and immediate discontinuation of any future business.

Further Developments will include: -

- Reviewing and where necessary improving processes created to manage the risk of modern slavery
- Establishing a process of continuous improvement to widen our scope of review, develop our policy and improve our statement.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- Whistleblowing policy: - the organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential email address to raise any concerns.
- Employee code of conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Supplier code of conduct: - The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship. Our supplier code of conduct lists critical failures within the manual to cover child labour, forced labour and slavery. In the event of a Critical Failure, Better Bathrooms reserves the right to cancel any current and / or future orders, without notice, and immediate discontinuation of any future business.
- Recruitment/Agency workers: - The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The organisation's due diligence and reviews include: -

- mapping the supply chain broadly to assess product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- We have also started pre-shipment inspections with our factories, where a sample of goods are physically inspected by a BB representative before it leaves the supplier.
- Our buyers visit supplier factories up to 4 times per year and this ensures we have a regular presence in our suppliers' premises, meaning we can be alerted to any issues.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship as stated within the Vendor Manual

One extra piece of due diligence we have introduced is that we have asked suppliers to voluntarily submit the cost makeup of our products, which will show for example the percentage of the cost of a product that is attributable to labour.

This allows us to potentially identify any suppliers whose cost of labour is lower than the market average for that category, which could be an indicator of poor working conditions.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation is [select the relevant KPIs from the list below]:

- We are in the process of rolling out a Supplier Audit programme. This will include a Social and Ethical element, which will involve a detailed inspection of employee documentation, facilities and training to ensure that workers are treated in the right way.
- We have developed a system for supply chain verification, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing existing supply chains regularly, whereby the organisation evaluates all existing suppliers.

Training

The organisation requires its buying staff to be aware of the policy and the signs to look for when visiting factories, to ensure products are ethically sourced.

All Human Resources staff are fully trained in UK right to work documentation, ensuring that only acceptable documents are provided which further protects against the use of forced labour.

The organisation's modern slavery training covers [select the relevant training areas from the list below:

- our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to identify the signs of slavery and human trafficking;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

[Board/Member] approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending 31st March 2018. This statement was approved by the Board of Directors of Better Bathrooms Ltd, who review and update it annually.

[Director's] signature:

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[Director's] name:

[] GEORGE ADAMS

Date:

[] 27.9.18