



Modern Slavery Act 2015 Policy

PURPOSE

The Modern Slavery Act 2015 requires commercial organisations supplying goods or services with a turnover of over £36M to prepare and publish an annual Slavery and Human Trafficking Statement. The Statement must set out the steps an organisation has taken to ensure that slavery or human trafficking is not taking place in its own operations or supply chain. This Statement covers all Crossling Ltd and all group related companies.

COMPANY BACKGROUND

T Crossling & Co Ltd is a Private Limited Company founded in 1855, subsequently a holding company for Crossling Ltd, the trading company and Crossling Properties Ltd, a property company. The company's principal business is as Plumbing and Pipeline Merchants, registered in England, which employs approximately 250 staff in 15 locations with a 2017 turnover of over £50 million. We source materials mainly from UK based companies.

POLICY AND PRINCIPLES

Crossling Ltd is committed to complying with its obligations under the Modern Slavery Act 2015 and other relevant legislation relating to the detection and prevention of Modern Slavery. To achieve this the Group has reviewed its activities, policies, procedures and working practices as well as those of its supply chain to ensure that nothing which meets the definition of Modern Slavery is taking place, or being permitted to take place.

Specifically, the Group has reviewed its activities to ensure that:

- Working conditions are safe and hygienic;
- Child labour is not used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practiced or tolerated;
- No extreme or inhumane treatment is allowed or tolerated; and
- Bribery and corruption is not tolerated.

The Group operates a zero-tolerance approach to breaches of the Modern Slavery Act 2015 and has in place policies and procedures for regularly undertaking reviews of its working practices to ensure compliance.

The Group's recruitment processes are formalised and documented with all new appointments being approved by Directors. There are robust procedures in place in relating to vetting new employees, which enables the Group to confirm their identities and ensure that they are paid both directly and correctly.

SUPPLY CHAIN

All efforts will be made to ensure our supply chain is operating in line with obligations under the Modern Slavery Act 2015 which will include regular assessments of our suppliers. Any member in the supply chain found not to be operating in an appropriate manner will be investigated and suitable action will be taken. All workers employed within our supply chain must have a legal right to work, have written employment details, be reimbursed appropriately either meeting or exceeding any legal requirements and their working hours should not be excessive. Everyone must have the right to work free from harassment or intimidation of any kind and their labour must be freely given and not be forced. The appropriate training and supervision should be provided on Health & Safety to ensure that all employees are able to carry out their duties in a safe environment.

APPROVAL

This Statement is made with respect to the financial year ended 31 December 2018. The Statement will be reviewed and updated annually to reflect our ongoing commitment to ensuring that our business and supply chains are free from slavery and human trafficking.

Signed: *C P H Errington* C P H Errington – Managing Director

Signed on behalf of CROSSLING LTD

DATE: 30th June 2019