

Anti-Slavery & Human Trafficking Statement 2019

This Statement sets out Northwood Hygiene Products Ltd actions to understand all potential Modern Slavery risks related to its business and to put in place steps to ensure there is no slavery or human trafficking in its own business and its supply chains.

Organisational structure and supply chains

This statement covers the activities of Northwood Hygiene Products:-

Business Activities: We provide the manufacturing, supply and transportation of away from home professional paper hygiene products.

Nature of Supply Chain: Our supply chain involves our own transportation of manufactured products to Distributors and Customers across the UK.

Responsibility

Responsibility for the organisations anti-slavery initiatives is as follows:-

- **Policies:** We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.
- All Directors and Senior Managers are responsible for compliance in their respective departments and for their supplier relationships.

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:-

Protected Disclosure/Whistleblowing Policy – The organisation encourages all of its employees to report any wrong doing at work, or any criminal acts. The organisations Protected Disclosure Policy is designed to make it easy for employees to make disclosures, without fear of retaliation.

Guiding Principles/Code of Conduct – The organisation has Guiding Principles which makes clear to relevant employees the actions and behaviour expected of them when working and representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour.

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

All suppliers have to go through a supplier approval process, which includes certification and accreditation status and to complete a questionnaire. Based on this we assess and review the supply chain to consider particular product and/or geographical risk of modern slavery and human trafficking for existing and new suppliers.



The supplier audit provides a good basic understanding to evaluate our supply chain, but we believe due diligence is an area where we can improve further. We will be reviewing our existing supply chain and create an annual risk profile for each supplier.

Where Northwood Hygiene Products identifies indicators of modern slavery in its supply chain, it will work with the relevant supplier to help implement effective measures to address the issue. If compliance with the code is suspected or proven to have been breached by any supplier, Northwood Hygiene Products Ltd reserve the right to request open and effective cooperation with verification, corrective remedial actions as well as the final option to terminate the commercial agreement.

Training and Awareness to our Employees

We have communicated our Modern Day Slavery Policy to all our workforce, providing them with information on how to identify and report potential slavery within the workplace.

In addition, we have provided all our employees with information on how to identify signs of slavery in every day life, along with details on how to report this outside of our organisation.

Conclusion

Slavery and Human Trafficking are serious crimes, and Northwood Hygiene Products Ltd are pleased to submit this statement outlining our commitment to the Aims of the MSA.

CEO Approval

This statement is made pursuant to section 54[1] of the Modern Slavery Act 2015 and has been approved by the Company's Chief Executive Officer who will review and update it annually.

Signed,

A handwritten signature in blue ink, appearing to read 'P. King'.

Paul King
Chief Executive Officer

April 2019