

Dennis & Robinson Ltd t/a Paula Rosa Manhattan
MODERN SLAVERY ACT – ANNUAL STATEMENT

Introduction

This statement describes the existing policies and structure that contribute to the prevention of potential abuses of slavery and human trafficking in compliance with the Modern Slavery Act 2015. In our activities of manufacture, supply and fitting of kitchens to the UK construction sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our activities and our supply chains. We operate in the United Kingdom: with manufacturing in West Sussex and distribution and fitting on mainland UK.

Risk Determination

We formally reviews business risk exposure on an annual basis and this review considers and identifies the risk of potential exploitation and exposure to modern slavery and trafficking issues. The most significant risk areas are identified below:

Risk Area	Basis of Risk Determination
Employment and staffing	High levels of international labour and temporary resources in the UK
Supply Chain – Goods	International supply base
Supply Chain – Sub-contractors	Demanding compliance regime

Risk Mitigation

Employment & Staffing

The business has stringent HR policies and recruitment practices ensuring compliance with The Modern Slavery Act 2015 and all other relevant employment legislation. Auditing practices are in place for checking that all employees have the right to work in the UK and that personal data are consistent with the individual employed. We have the same requirements of our temporary employment partners, and we review our recruitment methods to ensure transparency and compliance. Contracts with employment partners are vetted by the Human Resources department. Training for those employees who undertake recruitment and source or manage human resources ensures that Slavery and Human Trafficking are not taking place within the organisation.

Supply Chain - Goods

We operate a zero-tolerance policy towards Slavery and Human Trafficking in our supply base. All suppliers are required to provide a statement of conformity to our parent company's (Ballingslöv International) Code of Conduct and periodic inspections are carried out to ensure compliance. Our Group Head Office is partly responsible for procuring external goods and services and is dedicated to ensuring that suppliers and providers always adhere to our Code of Conduct and support our compliance to the Modern Slavery Act 2015.

Supply Chain - Subcontractors

Subcontractors and businesses supplying temporary manpower are vetted for compliance with all appropriate registrations and insurances relevant for their roles. Signing up to the Group Code of Conduct statement is one of the requirements.

Relevant policies

We operate policies that support our approach to prevent slavery and human trafficking in our operations:

- **Whistle-blowing policy:** We encourage all our workers, customers and stakeholders to report any concerns related to our direct activities, or those of our supply chains. This includes any circumstances that may give rise to a risk of slavery or human trafficking. Our whistle-blowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can contact the local HR Director or Ballingslöv International AB Group CFO. A refresh of the Whistle-blowing Policy and training is planned for all purchasers, HR and people in positions of authority in 2021.
- **Employee Code of Conduct:** Our Code of Conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of

employee conduct and ethical behaviour. The Code of Conduct is signed by all white-collar workers and its essential elements are included in the Employee Handbook which is issued with all employment contracts.

- **Supplier/Procurement Code of Conduct:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions; treat workers with dignity and respect; and act ethically and within the law in their use of labour. This is managed using RAMS (Risk Assessments and Method Statements) on construction sites to identify and mitigate any site-specific risk or working practices. We work with suppliers to ensure that they meet the standards of the Code of Conduct and improve their workers' working conditions. Serious violations of the supplier Code of Conduct will lead to the termination of the business relationship.

Before adding a supplier to the preferred supplier list, they must go through the supplier approval process, which includes but is not limited to:

1) completing an RFI (Request for Information) giving key information to assess the supplier's ability and risk.

2) completing a supplier evaluation document for short-listed suppliers including sections for health and safety and ethics. Certain questions are classed as critical, failure to comply with a critical question results in the supplier being dismissed. Critical questions include having both a modern slavery and bribery/corruption policy in place.

3) putting an SLA (service level agreement) in place which includes the supplier signing the Code of Conduct to confirm their compliance to the law and commitment against slavery and human trafficking.

- **Recruitment/Agency workers policy:** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency prior to engagement.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Due diligence and reviews include modern slavery and trafficking risks, including:

- mapping the supply chain to assess particular product or geographical risk.
- evaluating the risks of each new supplier.
- conducting supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating a risk profile for all suppliers and taking steps to improve substandard suppliers' practices.
- invoking sanctions, including termination of the business relationship, against suppliers that fail to improve their performance in line with an action plan or that seriously violate our Code of Conduct. An example within our Group was an Indian supplier of sinks identified as high risk, so a third party was appointed to carry out an independent audit of their factory to ensure it complied to the Code of Conduct. Some minor actions were highlighted and addressed as part of the process.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation has developed a system for supply chain verification which has been in place since September 2020. This enables the evaluation of potential suppliers before they enter the supply chain.

Director approval

This statement has been approved by the Dennis & Robinson Ltd board of directors.

Director's signature:

Director's name: ERIC PRESCOTT

Date: