
Waterline Limited

Human Rights &

Modern Slavery Statement

Updated April 2019

Registered Office:
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THE CROWN IMPERIAL GROUP

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1. Introduction

At Waterline Ltd. we are committed to running our business responsibly. We strive to maintain high ethical principles and to respect human rights. It also means doing our best to encourage high standards in our supply chain and business.

In this document we describe our business and supply chain, and how we operate them. We explain our current policies and practices, and the plans that we have to enhance these in light of the Modern Slavery Act.

2. Our business and supply chain

Waterline Limited was first established in 1985 and has become one of the largest companies supplying the UK's independent kitchen sector.

With its headquarters in Newport Pagnell and additional locations in Bolton and Bristol, Waterline stocks the best brands and deliver the finest customer service nationwide.

Our teams are committed to providing our customers with the very best service and ensuring that they are given accurate information and feel good about doing business with us. We also have an ongoing commitment of ensuring that our teams and customers are kept fully appraised in terms of education and the marketing of our entire portfolio, which is embodied in our very own reference books e.g. "The Blue Book". In addition, we furnish our customers with regular bulletins and the most up to date pricing and technical information.

We buy a vast range of things including white goods, sinks and taps, kitchen furniture, network and IT hardware, Personal Protective clothing, stationery and waste disposal services. Some of these products and services we use in our own business and some we use as part of what we sell to our customers. We have around 135 active suppliers.

On top of that, lots of our suppliers have their own suppliers. Our supply chain is therefore very large and complex. So we prioritise attention on companies that supply high value products or services, or things without which our business could not run.

3. Our stance on modern slavery

Our policy states that we do not use or accept forced, bonded or involuntary prison labour or child labour. Nor do we demand deposits or hold onto our workers' identity papers, or work with businesses that do. We only work with people who choose to work freely. We respect the right to equal opportunity, freedom of association and collective bargaining. Our company Employee Handbook reflects this under our "Code of Behaviour" and "Dignity At Work" and this handbook forms the Terms and Conditions of employment for all our staff.

The Employee Handbook sets out how we expect Waterline staff to behave. It applies to everyone. It is also the standard we expect from everyone who works on our behalf – including suppliers and contractors. We communicate changes to these policies, sometimes across the whole company or to specific groups, like our buyers and sales teams.

Separately, we have a "Supplier Approval" document which forms part of our purchasing terms for direct suppliers.

We welcome our people speaking up about any unethical behaviour, and make it easy for them to do so via their Line Manager. We ask our staff to report any wrongdoing or behaviour they think goes against our standards.

4. How we check compliance with our standards

We aim to prevent modern slavery or human trafficking in our business right at the start of our recruitment processes. We have a recruitment policy which aligns with our principles set out in our

Employee Staff Handbook. We either recruit using our own internal teams or using external agencies for some types of roles.

Once people join us, they're expected to live up to our Code of Conduct and Dignity at Work principles set out in the Employee Staff Handbook. We give our people plenty of support, education and training. But if they don't behave ethically at work we would consider taking disciplinary action against them, which ultimately could lead to dismissal.

As we keep learning more about the Modern Slavery Act, we'll review and refine the steps we take to identify potential incidences of slavery or human trafficking.

The steps we take for our supply chain depend on how we initially evaluate a supplier. We ask all but our lowest risk suppliers to complete our "Supplier questionnaire" – which helps establish whether there is a risk of them falling below our standards.

Risk profiling helps us focus our efforts where they are most needed. For example, suppliers may present a higher risk of slavery or human trafficking because of where they're based or the type of product or service they provide.

We keep our processes under review and we are looking at our supply chain approach in light of the Modern Slavery Act. We will analyse the areas in our supply chain which we perceive to be the biggest risk.

5. Helping Waterline people learn about the issues

Everyone who works for our company has a full Induction Program to complete when they start. We will be training staff over the coming months on the issues of Modern Slavery and we will then embark on a program to repeat this on an annual basis.

The training will include a section on human rights with specific training on modern slavery and human trafficking. We'll focus on helping people understand and identify slavery and human trafficking risks, and remind them how they can report any concerns.

6. Measuring how we're doing

We check how we're measuring up against our business standards by

- Ensuring that all new starters have completed their induction program in the first six months of their employment
- Ensuring that all other staff are up to date on their Modern Slavery and Human Trafficking training
- We track how effective we have been in following up responses to our "Supplier Questionnaire" and review the risks identified

We will continue to develop a more comprehensive programme addressing the risks of slavery and human trafficking beyond our direct suppliers. Longer term, we'll look at developing better ways of measuring the effectiveness of the steps we take to manage these risks.

This statement covers 1 April 2019 to 31 March 2020 and has been approved by the board of Directors at Waterline Ltd.