

# **EGL Group Modern Slavery and Human Trafficking Statement 2017-18**

The UK Modern Slavery Act 2015 includes a requirement for large businesses to publicly report on the steps taken each financial year to combat slavery in its own business, and in its supply chains. As required by section 54 of that Act, this statement sets out the steps taken by the EGL Group during the financial year ending 31<sup>st</sup> March 2018.

## **The EGL Group Business Activity and Structure**

The main business activity of the EGL Group is the manufacture and distribution of a wide range of cleaning products for use in the home and within the janitorial, catering and professional cleaning industries.

The EGL Group is made up of three privately owned trading companies. These are EGL Homecare Limited and Ramon Holdings Ltd (T/A Ramon Hygiene Products Ltd), both of which are based in the UK and EGL Coral, which is based in Leszno, Poland.

## **EGL Group Modern Slavery Position Statement**

The EGL Group strongly opposes any form of modern slavery and it is committed to ensuring there is no modern slavery and human trafficking in any part of its business or in its supply chain. The endeavour and approach to meeting this commitment is demonstrated by an adherence over the last 12 months to the following methods of working.

## **EGL Group Modern Slavery Strategy - Stronger Together (S2G)** ([www.stronger2gether.org](http://www.stronger2gether.org))

The UK sites are fully committed to a pro-active approach to preventing modern slavery and hidden labour exploitation based on the S2G strategy. S2G is a UK based business led, multi-stakeholder initiative whose purpose is to support organisations to tackle modern slavery within their businesses and supply chains. S2G provide guidance and resources to help UK based employers and their labour providers work together to reduce exploitation.

Steps already taken by the UK sites include implementation of a “Preventing Hidden Labour Exploitation” HR Policy, attendance at the “Tackling Modern Slavery in UK Businesses & Supply Chains” S2G workshop, raising awareness of Modern Slavery issues to staff through training and distribution of multi-lingual S2G worker leaflets and posters providing contact details for the GLA, the Modern Slavery Helpline, Migrant Help and the Salvation Army explaining how staff can identify and report human trafficking and other hidden third party labour exploitation. A copy of the worker leaflet is also provided as part of the induction process for all new staff.

## **Code of Conduct for Ethical Trade**

Underpinning the S2G strategy, the EGL Group works to a Code of Conduct for Ethical Trading aligned with the Ethical Trading Initiative Base Code ([www.ethicaltrade.org/eti-base-code](http://www.ethicaltrade.org/eti-base-code)), derived from the Core Conventions of the International Labour Organisation and the United Nations Universal Declaration of Human Rights, which clearly states the position of the group on modern slavery issues. To ensure compliance with the Code of Conduct, each site in the EGL Group has an independent, 3<sup>rd</sup> party Sedex Members Ethical Trade Audit (SMETA) every two years which includes confidential worker interviews and a thorough review of relevant documentation. Ethical audit reports are shared with major trade customers via Sedex (Supplier Ethical Data Exchange).

## **Sedex**

Each site in the Group is a member of Sedex, the world’s largest non-profit, web based collaborative platform for sharing responsible sourcing data on supply chains. Sedex is used by more than 38,000 members in over 150 countries to manage their own business and their supply chains, on issues such as labour rights, health & safety, the environment and business ethics.

## **The EGL Group Supply Chain**

A variety of products, raw materials and packaging are sourced from both national and international suppliers located in Europe, Asia, and the Far East. The Group believes that the greatest risk of slavery and human trafficking can exist in its supply chain but believes that the risk is mitigated as a result of clearly established standards, oversight and controls being applied throughout its sourcing process and dealings with suppliers.

This year the EGL Group amended its contractual terms with finished product and raw material suppliers to include a clause on compliance with the Modern Slavery Act. In addition, incumbent finished product and raw material suppliers have been asked to provide a signed Policy declaration confirming compliance to the following key revised policies:

- EGL Group Code of Conduct
- Business Ethics Policy
- Anti-Bribery Policy

The EGL Group Supplier Ethical Trade Policy states that the Group will actively seek to develop long-term trading partnerships with suppliers who take the following actions:

- Adopt the ETI Base Code or a similar Code of Conduct for Ethical Trade that clearly states their position on Modern Slavery issues.
- Work towards meeting the minimum standards of either their own Code of Conduct or the EGL Group Code of Conduct within appropriate agreed timescales.
- Seek to develop long-term trading partnerships with their own suppliers, agent(s), labour providers and subcontractors who have also implemented a Code of Conduct for Ethical Trade and who meet these minimum standards.
- Register with Sedex and complete the Sedex self-assessment questionnaire.

Thereafter the EGL Group uses several tools including Sedex resources including the Self-Assessment Questionnaire (SAQ), the Guidance on Operational Practice and Indicators of Forced Labour, Supplier Risk Assessment tool, the ETI website, the Global Slavery Index, UK Government Oversees Business Risk reports and Supplier Questionnaires to risk assess each supplier prior to award of business and then on a regular basis once a trading relationship is established.

All suppliers are asked to provide a copy of an approved independent 3<sup>rd</sup> party ethical audit report conducted within the last 12 months against an approved Code of Conduct covering Modern Slavery issues such as Forced and Bonded labour, Freedom of Association, Child Labour, Living Wages, Working Hours etc. Thereafter, high risk suppliers are asked to provide audit reports every 12 months, medium risk suppliers every 24 months.

In order to improve working conditions at suppliers, The Group have a continuous improvement approach. Therefore, if violations of the Code of Conduct are identified The Group work with suppliers to help them resolve those issues within a sensible time frame. However, if serious violations of the Code of Conduct are identified and the supplier is unable or unwilling to resolve those issues it will lead to termination of the business relationship.

The EGL Group UK sites have continued to raise awareness of the UK Modern Slavery Act and encourage UK based suppliers and their labour providers to attend the S2G “Tackling Modern Slavery in UK Businesses & Supply Chains Workshop”.

This statement has been approved by the EGL Group Board.

A handwritten signature in black ink, appearing to read 'Terry Dearlove', with a long horizontal flourish extending to the right.

**Terry Dearlove, EGL Group Managing Director**