



**Slavery & Human Trafficking Statement**  
MAY 2018

## Slavery & Human Trafficking Statement

This statement is made by the Board of Directors of Everest Ltd, pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes Everest's Slavery and Human Trafficking Statement for the financial year 2016/2017.

### Everest

Everest Ltd is a private limited company registered in England & Wales no. 04566809. It is ultimately owned by a publicly-traded investment fund, BECAP 12 Fund LP. Everest Ltd's registered office is Everest House, Sopers Road, Cuffley, Potters Bar, Hertfordshire, EN6 4SG.

Everest is a leading consumer brand specialising in the manufacture, installation and supply of uPVC, aluminium and timber windows, doors and conservatories, roofline products, garage doors, security systems, driveways and other home improvement products.

Everest has a workforce (including self-employed sales consultants, installers and service engineers) of approximately 1,450. It has two manufacturing sites (one in Sittingbourne in Kent and one in Treherbert in South Wales), two customer service centres and sixteen installation depots located around the UK. Its head office is in Cuffley.

Everest's supply chains are almost exclusively UK-based and include sourcing of materials used in the manufacture of its products at its two manufacturing sites and fully factored products handled and distributed via its Logistics Hub in Rugby.

### Slavery and Human Trafficking Policies

Everest has a dedicated Slavery and Human Trafficking Policy which is communicated to all of its employed and self-employed staff.

In addition, Everest's Equality & Diversity Policy, Dignity at Work Policy, Whistleblowing Policy, Recruitment Policy and Disciplinary Procedure are all relevant (or capable of being relevant) to the subject of Slavery and Human Trafficking. We are vigilant to ensure that staff are aware of this very serious issue and have the facilities to raise concerns should they come across any information which gives any cause for concern.

### Due diligence in supply chain

Everest demands the highest standards from itself and all of its business partners. To guard against slavery and human trafficking, this is never more important than in relation to its supply chains.

Our Procurement Team carefully assesses all potential new suppliers to ensure that they are both legally-compliant and ethical in their practices across a whole range of issues, including avoidance of slavery and human trafficking. As part of our initiative to identify and mitigate risk, our due diligence processes include:

- Making clear our expectations of appropriate business behaviour;
- Seeking to build long-standing relationships with suppliers and thereby over time gaining a fuller understanding of their businesses;
- Ensuring that our Tier 1 suppliers are always UK-based or have a UK trading presence
- Ensuring that our points of contact are always UK-based;
- Adopting and in turn requiring of our Tier 1 suppliers a 'one up' audit approach, with each supplier carrying out appropriate due diligence on the next supplier above them in the chain. Part of this due diligence requires these entities to have suitable anti-slavery and human trafficking policies and procedures themselves;
- Maintaining and publicising systems to encourage the reporting of concerns and the protection of any such 'whistleblowers';
- Carrying out regular supplier audits to ensure compliance with the standards we set as detailed above.

## **Supplier adherence to our values**

We have zero tolerance for slavery or human trafficking in any form. We expect all those in our supply chain to share and adhere to our values in this regard. This enables us to be as sure as we can that all products and consumables are ethically-sourced and in ways which are consistent with the obligations under the Modern Slavery Act 2015.

Whereas supplier tender responses are generally evaluated on a matrix basis, we will not do business with any supplier which does not satisfy us either:

- (a) that its supply chain is free from a risk of slavery and human trafficking, or
- (b) (where there are risks), that the risks have been properly identified and steps are being taken to manage the risk appropriately.

## **Risks and risk management**

Within our own supply chain, the risk is very low. This is largely due to the fact that our suppliers are predominantly large and reputable UK-based businesses, often with sufficient turnover for them to have their own legal obligation to publish a Slavery and Human Trafficking Statement.

## **Our effectiveness**

Everest uses the following Key Performance Indicators to measure our effectiveness in ensuring that slavery and human trafficking has no part in our business or supply chains:

- ° Communication & personal contact with next link in the supply chain, ensuring their compliance with our expectations;
- ° Use of payroll systems and labour monitoring;
- ° Completing supplier audits – we aim to audit our top 20 suppliers every 6 months, the remaining suppliers every year and suppliers of suppliers every other year.

## **Training about slavery and human trafficking**

All of our statutory directors and Executive team have been briefed on the subject of modern slavery and on our Modern Slavery and Human Trafficking Policy.

A similar briefing has been given to the staff working within the Supply Chain.

All of our employees and self-employed will be trained on this important topic during the course of this financial year.

Peter Mottershead  
Chairman and CEO

# Slavery and human trafficking policy

## 1. Scope

1.1 This policy applies to all persons working for Everest or on our behalf in any capacity, without exception.

## 2. Policy statements

2.1 Everest has a zero-tolerance approach to modern slavery.

2.2 We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

2.4 We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Further, we expect that our suppliers will hold their own suppliers to the same high standards.

## 3. Responsibility for the policy

3.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 The Head of Supply Chain has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

3.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

3.4 All staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Supply Chain.

## 4. Compliance with the policy

4.1 Employees and contractors must ensure that they read, understand and comply with this policy.

4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All such persons are required to avoid activity that might lead to, or suggest, a breach of this policy.

4.3 Anyone who believes or suspects that a conflict with this policy has occurred, or may occur in the future, must report it to a senior manager or director immediately.

4.4 Employees and contractors are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, this should be raised with the Head of Supply Chain.



4.5 Everest encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

## **5. Communication and awareness of this policy**

5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us or with us, and regular training will be provided as necessary.

5.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## **6. Breaches of this policy**

6.1 Any employee who breaches this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

6.2 We will terminate our relationship with other contractors or organisations working on our behalf if they breach this policy.

## **7. Status**

7.1 This policy does not form part of any contract of employment or engagement and the terms may be amended by Everest from time to time at its sole and absolute discretion.