



Anti-Slavery and Human Trafficking Statement and Policy

Modern Slavery and Human Trafficking Statement

INTRODUCTION

This statement sets out the actions of Lakes Bathrooms LTD. ('the Company') to understand the potential modern slavery risks related to its business. Where necessary, the Company will put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and supply chain. This statement relates to actions and activities during the calendar year **1 January 2019 to 31 December 2019**.

As a UK company with manufacturing facilities overseas, the Company recognises it has a responsibility to take a robust approach to slavery and human trafficking.

COMPANY STRUCTURE AND SUPPLY CHAIN

1.1 This statement covers the activities of the entire Company:

Lakes is a manufacturing and distribution business for the UK shower enclosure market. It has manufacturing facilities (a wholly owned subsidiary of Lakes) based in Ningbo, China with its headquarters in Tewkesbury, UK.

1.2 Countries of operation and supply

The Company currently operates in the UK & China.

- all Company distribution facilities are located in the UK
- main purchases include finished aluminium, toughened safety glass plus manufacturing machinery and tooling and third-party distribution

1.3 High-risk activities

The following activities are based overseas and evaluated / audited annually by the Board re. risk of slavery or human trafficking:

- all factory staff in China are direct Company employees with no sub-contract manufacturing staff
- there are 3 main categories of employee: managerial, manufacturing and administration.
- pay and conditions for all overseas employees are overseen by the UK board (see 'Current policy – actions' below)
- pay and conditions at the Company's Chinese facility are managed by the Factory General Manager in China
- freight and transport partnerships are overseen by the UK board and managed by the Factory General Manager in China



1.4 Due diligence measures

The Company continues to develop its due diligence in its high-risk activities:

- Board audit / review of policy adherence in its direct Chinese operations
- addressing anti-slavery policy in all supply chain reviews with Tier Two suppliers
- developing a programme of communication and training for key management staff

1.5 Current Policy – actions

Tier One Suppliers (Factory - Ningbo, China)

The following minimum criteria are in place and in full compliance with the Labour Law of the People's Republic of China:

- minimum age of 18 years for all employees, in accordance with latest government legislation
- minimum wage in accordance with latest government legislation
- full compliance with all national Chinese holidays
- a maximum 40 hours per week at standard wage rate
- a maximum 6-day working week
- Health & Safety policy providing PPE and safety training to all employees
- midweek overtime premium (basic x 1.5)
- weekend overtime premium (basic x 2)
- Certificate of Identification check for all potential employees as part of the recruitment process
- additional 5 days holiday per annum for >1 year and < 10 years' service
- additional 15 days holiday for >10 year and < 20 years' service

Tier Two Suppliers

The following minimum criteria are met in full:

- minimum age of 18 years for all employees, in accordance with latest government legislation
- minimum wage in accordance with latest government legislation
- signed supplier compliance documents held / audited

1.6 Responsibility

Responsibility for the Company's anti-slavery initiatives are as follows:

- overall policy & governance UK Board of Directors
- policy compliance (China) Factory General Manager, China