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## Slavery and human trafficking statement 2019/20 (Modern Slavery Act 2015)

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### (1) English Architectural Glazing Ltd Statement

1. EAG is committed to the highest level of ethical standards and arrangements.
2. EAG adopts zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.
3. We fully support the government’s objectives to eradicate modern slavery and human trafficking.
4. Our statement will be reviewed annually to ensure where required it will provide information of our activities and supply chains and actions we are taking to support the government.
5. We will call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Name	Position	Signature	Date
S E Gladwin	Managing Director		7 <sup>th</sup> January 2019

## **(2) Statement introduction**

1. English Architectural Glazing Ltd is a large Curtain wall manufacturer and installer providing work for a number of suppliers and installers within the UK.
2. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2018.
3. This is our first annual statement and it contains a summary **(3)** of progress to be undertaken within our first year of our current work plan.
4. Our activities take place solely in the UK.

## **(3)Steps taken by EAG since April 2017 – Year 1 of our work plan**

### **3.1 Management responsibility and general awareness**

Responsibility for the preparation and publication of this policy resides with the EAG HSQ department

We have:

1. Reported progress to our Management Teams and our Board of Directors
2. Reconfirmed management responsibility for this policy and statement and received full endorsement from our Board of Directors.
3. Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our approved sub-contract supply chain and other companies with which we regularly engage.

### **3.2 Risk assessment**

1. We have completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice.
2. Benchmarked our activities against statements and action plans undertaken by similar organisations.
3. The H&S department has undertaken a risk assessment to determine our risk exposure.
4. Reconfirmed that our primary risk is an association with a Delivery Partner, approved sub-contractor or company with an ambiguous or non-compliant supply chain.

## **(4)Supply chain and business due diligence**

### Scope of our procurement activities

1. Our procurement activities take place in the UK; and our contractors and suppliers are predominantly UK and from Europe.
2. We use professional multi-disciplinary services and development expertise. This includes the services of development or construction companies, with their associated goods, materials and labour-related supply chains.
3. We do maintain a goods, materials and contract-labour supply chain.

### 4.1 Procurement and tender process improvements

1. Existing tender documentation includes the mandatory exclusion of any bidder who has been convicted of an offence under the Modern Slavery Act 2015.
2. The tender Pre-Qualification Questionnaire (PQQ) process was updated in during 2017

### 4.2 Expectation and encouragement

1. We expect all Delivery Partners, organisations within our Business and other companies we engage with to ensure their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015.
2. Are transparent, accountable and auditable, and are free from ethical ambiguities.

## **(5) Reporting of non-compliance**

### 5.1 EAG supply chains

1. Individuals with evidence of non-compliance with the Modern Slavery Act in connection with EAG supply chains or businesses we engage with, are encouraged to report their concerns to the national reporting service below.

### 5.2 Other supply chains

2. If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the **Modern Slavery Helpline on 08000 121700.**

## **(6) Steps to take – Year 2 – 2018/19**

### **6.1 Management responsibility and general awareness**

We will:

1. Report progress to our Management Teams and our Board of Directors.
2. Continue to raise awareness of this published statement by re-notifying organisations in our register of approved contractors & suppliers and other companies with which we regularly engage.
3. Remind employees of our obligations under the Act.
4. Prepare the Second annual statement for publication in 2018.

### **6.2 Further risk assessment**

We will:

1. Undertake an annual review of this policy against our activities to establish whether the approach we have taken remains proportionate and appropriate.
2. Assessing and interpreting any recent or emerging case law and best practice.
3. Benchmarking our activities against statements and action plans undertaken by similar organisations.

### **6.3 On-going risk mitigation**

We will:

1. Act promptly where a compliance breach has been identified or flagged.
2. Continue to feed-back lessons learnt into our risk management process.

## **(7) Policy – Revision Record**

Rev No	Effective date	Sections Affected	Next current Review date	Prepared By	Approved By
1	July 2017	N/A first issue	6/1/2018	G. Young	S.E. Gladwin
1	As above	None at this time	January 2019	G. Young	S.E. Gladwin