



V2 – 01/08/2023

## Modern Slavery & Human Trafficking Statement

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*"Proud to be operating in Hull,  
UK City of Culture"*

This is Hawthorn Timber Limited (the 'Company') statement on slavery and human trafficking and is made pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act')

It sets out the Company's actions to understand all potential modern slavery risks relating to its business, and to put in place steps that are aimed at ensuring that there are no slavery or human trafficking in its own business and its supply chains.

This updated statement related to actions and activities during the financial year 1<sup>st</sup> January 2022 to 31<sup>st</sup> December 2022.

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

The Board of Directors have the overall responsibility for ensuring this policy, disclosure statement and its implementation comply with legal and ethical obligations. Managers, at all levels, are responsible for ensuring those reporting to them understand and comply with this policy and disclosure statement, and are given adequate and regular training.

### **Due Diligence and Risk Assessment**

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk, the Company has in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

### Risk Assessment

The Company operates due diligence on all new suppliers.

This includes a self-assessment declaration that they do not take part in activities which would fall under the Modern Slavery Act 2015.

The Company also conducts annual suppliers audits.

### Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

There is a Company induction where our policies, procedures and expectations are outlined.

### Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment

### Policies

The Company is committed to, and have a range of policies, that includes:

- Whistle Blowing
- Equality, Diversity and Inclusion
- Harassment and Bullying



Richard Thompson  
Managing Director  
Date: 11/8/23