

Modern slavery statement

Organisation

This statement applies to Clifton Trade Bathrooms Limited (referred to in this statement as 'Clifton'). The information included in the statement refers to the financial year 2023.

Organisational structure

Clifton, based in the UK, supplies a range of bathroom products to trade customers (typically small tradesman). It is a multi-site in-stock business, supplying its products through its 44 branches across the UK. These branches are supported by a central support office and a central warehouse, both based in Bolton.

Definitions

Clifton considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

Clifton acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Clifton understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Clifton does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Clifton in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Clifton strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Supply chains

In order to fulfil its activities, Clifton sources its bathroom products from various suppliers in the United Kingdom, Europe, Turkey and China.

Potential exposure

Clifton considers its main exposure to the risk of slavery and human trafficking to exist in its bathroom product supply chains. We recognise that our highest exposure to modern slavery and human trafficking is through our supply chain because they involve the provision of labour in a country where protection against breaches of human rights may be less stringent. We take a diligent and comprehensive approach when reviewing our existing supplier relationships and when considering business opportunities with new suppliers.

In general, Clifton considers its exposure to the risk of slavery/human trafficking to be relatively limited.

Steps

Clifton carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Clifton has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Clifton has taken the following steps to ensure that modern slavery is not taking place:

- A zero-tolerance policy towards modern slavery is in place.
- Action plans are in place to address risk to modern slavery, which forms part of our annual supplier audit process.
- Measures are in place to identify and assess the potential risks in our supply chains. Annual visits to all suppliers take place. Supplier audits also take place annually and this is partly to ensure human rights values are upheld.
- Impact assessments are conducted across our product range to manage the risk of instances of slavery being identified within our supply chain. Across most product categories we have two or more suppliers to reduce our business risk in the event of the discovery of unethical supplier behaviour.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Approved by the Board of Directors on 26 June 2024.

Signed on behalf of the Board of Directors by

Marc Jones
Finance Director