



# The Modern Slavery Act- Anti-Slavery and Human Trafficking Policy Statement for the Financial Year 2023/24.

#### **Introduction & Commitment**

In accordance with the Modern Slavery Act 2015, View Logistics Limited ("View Logistics" or "we") is committed to a work environment that is free from Human Trafficking and Slavery, forced labour and unlawful child labour. We have a zero tolerance towards modern slavery and are committed to eradicating these practices from our operations and supply chains and taking proactive preventative steps towards this goal. We recognise our responsibility to protect human rights and protect the well-being of individuals affected by our business activities.

### **Organisation Structure & Supply Chains**

View Logistics Limited, part of Victoria Plc, is a sales and marketing business supplying floorcoverings to both Residential and Contract market sectors within the UK, EU and selected International Markets under the Hugh Mackay, Thomas Witter, Gaskell Mackay and CLD brand names based in Hartlepool, Teesside. For more information about our activities visit our websites:

www.hughmackay.co.uk

www.thomaswitter.com

www.gaskell.co.uk

www.carpetlinedirect.co.uk

We have a global supply chain purchasing commodities, materials, packaging, utilities, services, and goods for resale from across the world.

#### Policies in relation to slavery & human trafficking

View Logistics is implementing robust policies and procedures to combat modern slavery. Our policies include a code of conduct that sets out our expectations regarding human rights, labour standards and ethical business practices. We require all employees and suppliers to adhere to these standards. We encourage the reporting of any concerns or suspicions related to modern slavery.

See attached Policy Document

# **Supplier Engagement & Due Diligence**

We are engaged with our supply chain to ensure they share our commitment to eradicating modern slavery. Our supplier Code of Conduct clearly communicates our expectations and requirements regarding human rights and labour standards. We work closely with our suppliers to ensure they understand and implement these standards and will regularly assess their compliance through

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supplier assessment audits and site visits to identify potential risks and take appropriate action to address them.

See attached Supplier Charter & Annual Audit Questionnaire

# **Monitoring & Evaluation**

View Logistics are committed to monitoring and evaluating the effectiveness of our anti-slavery measures. We are establishing KPI's to measure progress and improvements in combatting modern slavery. Regular reviews and assessments will take place to enable us to identify any areas for improvement and to implement appropriate actions to ensure our commitments are met.

## **Training & Awareness**

We are committed to communicating our policies and expectations to our employees and stakeholders to enhance their understanding of modern slavery issues. Our initiatives aim to raise awareness, promote ethical behaviour and empower individuals to identify and address any signs of modern slavery within our operations and supply chains.

## **Reporting and Transparency**

We are committed to transparency and will publish this modern slavery statement on our company web sites. This statement will be reviewed and updated regularly to reflect our ongoing and evolving commitment to combatting modern slavery in all its forms. We will also report annually with details of our progress in implementing anti-slavery measures.

#### Senior Management Approval.

This modern slavery statement has been approved by our senior management team, who fully support our commitment to eradicating modern slavery and human trafficking.

Authorised by: Stephen Donlan

**Managing Director** 

Date: July 2023

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#### Policies in relation to slavery and human trafficking

We will not knowingly use unlawful child labour or forced labour in any of the products and/or services we provide, nor will we accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

Our recruitment processes are in line with UK employment laws, including "right to work" document checks, contracts of employment, and checks to ensure everyone employed is of legal working age. We offer market-related pay and rewards which are reviewed annually. We employ directly and do not use labour providers.

We have an ethical trading policy which outlines our commitments to ensure both we and our suppliers meet as a minimum the ETI base code.

We have a supplier charter that commits our suppliers to agree that they:

- Will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty;
  - Will ensure that the overall terms of employment are voluntary;
  - Will comply with the minimum age requirements prescribed by applicable laws
  - Will compensate its workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements;
  - Will abide by applicable law concerning the maximum hours of daily labour;
  - Will not engage in any practice of slavery, servitude, forced labour, compulsory labour and/or human trafficking outside the UK which would constitute an offence if that conduct took place within the UK; and
  - Will ensure that any sub-contractors or suppliers from whom they source goods and/or services for incorporation in those supplied to View Logistics Limited, also adhere to these requirements.

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## **Ethical Trading Initiative - Base Code**

The ETI (Ethical Trading Initiative) Base Code is a set of internationally recognised labour standards that form the foundation of ETI's work in promoting ethical practices and ensuring the protection of workers' rights. The ETI Base Code is based on the principles set forth by the International Labour Organization (ILO) and covers various fundamental labour rights. The code is designed to be implemented by companies and their suppliers to ensure fair and ethical treatment of workers throughout the supply chain.

The ETI Base Code consists of the following key elements:

- 1. Employment is freely chosen:
  - No forced, bonded, or involuntary labour.
  - No human trafficking.
- 2. Freedom of association and the right to collective bargaining:
  - Respect for the right of workers to join or form trade unions.
  - Recognition of the right to engage in collective bargaining.
- 3. Working conditions are safe and hygienic:
  - Provide a safe and healthy working environment.
  - Adequate measures to prevent accidents, injuries, and occupational hazards.
- 4. Child labour shall not be used:
  - No employment of children below the legal minimum age for work.
  - Appropriate measures to ensure the effective abolition of child labour.
- 5. Living wages are paid:
  - Wages should meet at least legal or industry minimum standards.
  - Provision of wages that can meet the basic needs of workers and their families.
- 6. Working hours are not excessive:
  - Compliance with national laws and industry standards regarding working hours.
  - Voluntary overtime and reasonable working hours.
- 7. No discrimination is practiced:
  - No discrimination based on race, gender, age, religion, disability, or other protected characteristics.
  - Equal opportunities and fair treatment for all workers.

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- 8. Regular employment is provided:
  - No use of precarious employment arrangements that undermine workers' rights.
  - Provision of secure and stable employment relationships.
- 9. No harsh or inhumane treatment is allowed:
  - No physical, verbal, or psychological abuse or coercion.
  - Respect for the dignity of workers.

The ETI Base Code serves as a framework for companies and suppliers to assess and improve their labour standards and practices, promote transparency, and collaborate with stakeholders to achieve ethical and responsible supply chains.

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