

Michael Pavis Ltd Modern Slavery Statement 2019

INTRODUCTION

Michael Pavis Limited (MPL) has a zero-tolerance approach to modern slavery.

We are committed to acting ethically and with integrity in all our business dealings. Modern slavery is a crime and a violation of fundamental human rights, and we have a responsibility and obligation to understand and eliminate the risks.

MPL recognises this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

MPL is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. MPL expects the same standards and commitment from all of its suppliers, contractors and other third parties.

OUR BUSINESS

We are the largest independent plumbing and heating merchant in the East Midlands. We have built a reputation based on our extensive stock of boilers, central heating components, sanitaryware and plumbing products, plus our experienced and knowledgeable staff, and our ability to make free, accurate and timely deliveries the very next day.

The directors of MPL have ultimate responsibility for tackling the issues of modern slavery. The day to day work will be undertaken by the managers and all the staff of MPL. All concerns relating to modern slavery should be raised with our Managing Director, James Pavis. Employees are expected to report any concerns, and management are expected to act on those concerns without delay.

OUR POLICIES, CORE VALUES AND 'ETHICS FIRST'

One of our mission statements is to adhere to a philosophy of Ethics First in everything we do. The commitment to Ethics First provides the behavioural framework for our relationships with our employees, customers and suppliers. Honesty, integrity and professionalism are the core principles of our business. We expect our staff to adhere to these standards in their daily actions and, in line with our core values, we are committed to improving our processes to help combat modern slavery and human trafficking.

OUR SUPPLY CHAINS

Our supplier base for materials purchased and services provided include: heating and plumbing manufacturers and distributors, office supplies, IT hardware and software, cleaning services, office and building maintenance services, and professional services such as those provided by the MPL's external financial auditors. The majority of our supplies are UK registered companies based locally and nationally. We also have a small number of suppliers in the EU. We do not purchase any materials from companies based outside the EU.

We will review our systems and controls so that these remain effective in ensuring modern slavery and human trafficking is not knowingly taking place anywhere in our supply chain.

DUE DILIGENCE PROCESSES

We identify and assess the risk of potential modern slavery and human trafficking risk areas in our supply chains. We assess all existing and new suppliers and have a supply chain compliance programme, which consists of:

- Requiring all staff to comply with our Modern Slavery Statement and to avoid any activity that might lead to a breach of this policy.
- Encouraging all staff and third parties to raise any concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage and to notify a manager.
- All managers who are responsible for procurement of goods and / or services must ensure that the Modern Slavery Statement and the MPL's zero-tolerance approach to modern slavery is communicated to all third parties during the procurement process and / or at the outset of each business relationship.
- Protect staff from victimisation or retaliation if they raise concerns about slavery and human trafficking, even if raised in error.

TRAINING

To raise awareness of the potential risks of modern slavery and human trafficking, we provide guidance to support our employees understanding of expected behaviours. All staff have been provided with our Modern Slavery Statement, and are made aware of the risks of modern slavery and human trafficking in our supply chains and our business. Management will periodically review this policy, especially in the event of new legislation or serious policy breach.

OUR EFFECTIVENESS IN ELIMINATING MODERN SLAVERY

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, supply chains, members of the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

APPROVAL

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Michael Pavis Limited's slavery and human trafficking statement for the financial year ending 31 December 2019.

The Board of Directors has approved this Statement and authorised any Director of the Company, acting individually, to sign this Statement.

Signed for and on behalf of Michael Pavis Limited.



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James Pavis
Managing Director

2-1-19
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Date