



XL Joinery Ltd
Holden Ing Way
Birstall
Batley
West Yorkshire
WF17 9AD

XL Joinery Ltd (Also T/A Golden Pharos Europe Ltd) Modern Slavery Act Statement

Slavery is an issue that continues to be a global problem and needs to be addressed. XL Joinery recognises the need for action and are committed to ensuring there are no instances of slavery, forced labour or unfair working conditions within all elements of our supply chain.

XL Joinery is proud to have provided quality doors and joinery related products for over 20 years to some of the most prestigious names in the building products industry. Our products are sourced from around the globe and as such we recognise that the complexity of our supply chain allows for greater risk of slavery and forced labour.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Ethical Sourcing Policy reflects our commitment to acting ethically and is at the heart of the ongoing evaluation and selection of new suppliers. Our supply chain is an integral part of our operations, and our success and reputation are linked to their performance and ethics.

To mitigate the risk of any form of modern slavery occurring within the supply chain, XL Joinery implements a number of controls;

- Suppliers have been made aware of the problem of modern slavery and have signed an agreement that warns of potential cessation of trading with XL Joinery, should any instances of slavery or forced labour be discovered.
- Inspectors in the far east will monitor factories and report any potential instances of unethical or illegal behavior
- Factory inspections carried out by XL Joinery staff will also look out for anything that contravenes the ethical sourcing policy or is illegal.
- For a number of years, XL Joinery has made it a priority that as many products as possible are purchased certified, either FSC or PEFC. Chain of Custody (CoC) certification schemes such as FSC and PEFC contain strict requirements upon the prohibition of forced labour within any accredited organisations. The complexity of the supply chains make this the most viable and robust option for removing the risk of slavery from the supply chain.
- For non-certified products, XL Joinery undertakes a Responsible Purchasing Process (RPP). Within this there are requirements prohibiting the use of compulsory or forced labour and requiring the adherence to national labour laws.

These mitigation measures are implemented on an ongoing basis and their effectiveness for keeping slavery and forced labour out of the XL Joinery supply chain will be periodically reviewed. We seek to work with companies who share our principles and work according to our policies on health and safety, ethics and environment standards and who are prepared to commit themselves to meeting the requirements of these codes. We are committed to working with suppliers to support necessary improvements however, we will also take action if suppliers and sub-contractors do not meet our standards and should any instances of slavery or forced labour be recognised or suspected within the supply chain, through discovery by ourselves or from advice received from external sources, XL Joinery will take appropriate action within the context in which it has been identified.

Signed: *Mark Williams*

Position: Director of Technical & Product Development

Date: 01/04/2021