



**MODERN SLAVERY
AND HUMAN TRAFFICKING
STATEMENT 2025**

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MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2025



Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:

- Forced and compulsory labour or human trafficking
- Slavery
- Servitude
- Child labour
- Forced labour
- Harsh, cruel, and degrading practises
- Excessive working hours
- Unsafe and unhygienic working conditions.

These bullet points share a common theme, the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Millboard recognises the importance of the Modern Slavery Act 2015; this document describes the steps taken.

by the company to understand and minimise the potential risk of modern slavery in its business and in its supply chains.

This statement is published in line with section 54(1) of the Modern Slavery Act 2015 and is designed to aid transparency and be easy to understand.



ABOUT US

Millboard manufactures decking and cladding products for the domestic and commercial landscaping market.

Our products are manufactured in the UK and distributed Worldwide. Millboard decking and cladding products are unique and replicate the appearance of natural wood without the disadvantages of wood. We uphold, support, and encourage clear and honest communication between all staff in the workplace.

Millboard companies are wholly-owned subsidiaries of Elmdene Group Limited. To find out more about Millboard visit our website.

www.millboard.com

OUR COMMITMENT

Adhering to the principles of the Modern Slavery Act 2015

Millboard is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want and encourage all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We do not knowingly enter into business with any organisation, in the UK or abroad, which endorses or is found to be involved in slavery and forced or compulsory labour.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

Our supply chains are relatively limited and straightforward, where we procure goods and services from a restricted range of UK and European suppliers, mainly through long established trading relationships. We do not consider that we operate in high-risk industry or in geographic areas where slavery is more prevalent.

We have formed a framework to regularly audit our suppliers to ensure they too comply with the Modern Slavery Act 2015. This includes mechanisms for guarding against modern slavery in their supply chains. Any issue that is identified as part of our audit activity is investigated accordingly.

OUR POLICIES

The following policies are available to all staff through the Millboard internal People HR website in relation to the Modern Slavery Act 2015:

- Whistleblowing policy.
- Anti Harassment and Bullying Policy.
- Diversity and inclusion as detailed on our website.
- Recruitment and selection policy is fair and open to all eligible candidates.

DUE DILIGENCE & RISK MANAGEMENT

Millboard performs proportionate due diligence on suppliers through key supplier questionnaires, as part of our wider framework of managing risks associated with modern slavery and human trafficking.

The business undertakes an assessment of any new suppliers that we look to associate with and seeks to identify any risks relating to modern slavery prior to contracting. If such risks could not be mitigated or remediated sufficiently, Millboard would not look to form a relationship with the prospective supplier. The business is aware of the continuously changing nature of modern slavery, which is why activities such as training and risk management are not considered to be 'one and done' exercises.





EMBEDDING THE PRINCIPLES AND TRAINING

We will continue to embed the principles of the Modern Slavery Act 2015 through:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking. Our target is to ensure that 100% of colleagues receive training at least on a bi-annual basis and on induction.
- Ensuring that consideration of the modern slavery risks and prevention are added to Millboard's policy review process as an employer and procurer of goods and services.
- Making sure Millboard's procurement strategy, vetting and contract terms and conditions include references to modern slavery and human trafficking.
- Continuing to take action to embed a zero-tolerance policy towards modern slavery
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers are highly aware of modern slavery and ethical employment practices.
- Working collaboratively with other businesses to improve and share knowledge relating to risks around modern slavery.

Millboard continuously reviews its approach, controls and policies relating to modern slavery and strives to play its part in reducing this exploitation and the impact on workers.

This statement has been approved by the board and is signed off by Harvey Douglass, Chief Commercial Officer of The Millboard Company for the financial year ending 31 December 2024.

This statement will be reviewed and updated at least annually.

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