



Modern slavery and human trafficking statement

2019

Introduction

Section 54 of the UK Modern Slavery Act imposes a legal obligation on commercial organisations to publish an annual slavery and human trafficking statement.

This statement sets out the Tradelink Group ('Tradelink') actions and steps it has taken to understand and address any potential modern slavery and human trafficking risks related to its business operations and supply chains. This statement relates to actions and activities during the 2018 financial year.

As part of the global timber sector where instances of modern slavery have been identified and published by the media and NGOs, the organisation recognises that it has a responsibility to take a robust approach to tackling modern slavery and human trafficking.

Tradelink is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure

Tradelink Group is a multinational business, specialising in procuring, machining, shipping and marketing hardwoods.

Tradelink undertakes the following activities:

- Supplying a selected range of timber products from the timber producing regions around the world. These products include sawn lumber, decking, flooring, laminated products, plywood and railway sleepers
- Providing a range of wood species in standard sizes and grades as well as specific cut to order bespoke specifications
- Holding stocks of key standard products in strategically placed warehouses around the world
- Manufacturing of solid hardwood flooring and other wood products at our own factory in Brazil

Countries of operation and supply

The organisation currently operates in the following countries:

Country	Location	Scope
U.S.A.	Greensboro, NC	Import, Sales & Procurement
Canada	Burlington, Ontario	Import, Sales & Procurement
China	Shanghai	Import and Sales

France	Nantes	Import and Sales
Portugal	Lisbon	Import and Sales
South Africa	Durban, Cape Town & Johannesburg	Import and Sales
Brazil	Belém, Pará	Manufacturing, Export & Procurement
U.K.	London	Head Office, Import and Sales
Singapore	Singapore	Procurement from S.E. Asia region

Supply regions include: North America, South America, Malaysia, Indonesia and West Africa

Assessing and managing risk

Tradelink follows the [EUTR](#) and [Timber Trade Federation](#) due diligence procedures. Its approach to assessing modern slavery risk in the supply chain builds on the risk assessment procedures that currently exist within the company.

Tradelink's risk assessment of modern slavery includes the following processes:

- We check both the Transparency International Corruption Index of each source country where the logs are harvested, and the UN Security Council and Council of the EU to see if sanctions exist to help us assess the risk of slavery
- We use resources such as the Global Slavery Index Country guidance to get information on possible risks identified in the regions we source in.
- We assess the responses of each new supplier completed Responsible Purchasing Policy (RPP) and attached forms
- We have an ongoing evaluation risk assessment of our current suppliers
- The supply chain for each product/species undergoes a detailed Risk Assessment Analysis
- we require additional information and verification from the supplier where the assessment highlights the risk of possible slavery in the supply chain

Governance

The development, annual review and oversight of our policies and procedures in relation to anti-slavery initiatives is the responsibility of the Group Compliance Officer and approved by the board of directors,

Our employees have been orientated on the benefits of developing stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Our policies

Tradelink is aware that the risk of modern slavery impacts across a range of policies.

Tradelink operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Human Rights Policy

- Respect for human rights is a fundamental value of Tradelink. We strive to respect and promote human rights in our relationships with our employees and suppliers
- We are intolerant to disrespectful or inappropriate behaviour, unfair treatment or relation of any kind. Discrimination and harassment are not tolerated in the workplace and in any work-related circumstance outside the workplace.
- The health and safety of our employees is of high importance. Our policy is to provide a safe and healthy workplace and comply with applicable health and safety laws and regulations, as well as internal requirements

Anti-slavery and Human trafficking policy

- Modern slavery is a crime and a violation of fundamental human rights. It 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. We have a zero-tolerance approach to modern slavery, all forms of forced labour and any form of human trafficking and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- We are also committed to ensuring there is transparency in our own business, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.
- We prohibit the hiring of individuals under 18 years of age for positions in which hazardous work is required.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, contractors, external consultants, third-party representatives and business partners.

Employee code of conduct Our code makes clear to employees the actions and behaviour expected of them when representing Tradelink. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. Tradelink's policy is to treat all its own employees with dignity and respect.

Supplier/Procurement policy: Tradelink is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where

necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Tradelink requires that suppliers meet the requirements of its purchasing policy.

Recruitment policy We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting staff from that agency. The policy is being reviewed to ensure that specific references are made to combatting the risk of modern slavery in 2017

Due diligence, monitoring and auditing

Tradelink undertakes due diligence when taking on new suppliers and it carries out annual reviews of its existing suppliers, or more regularly as required. . Tradelink's due diligence approach to Procurement is clearly outlined in our "*Due Diligence Procedure for Sourcing of Timber products*".

Our due diligence processes include:

- Scheduling a high level risk mapping of the supply chain broadly to assess modern slavery and human trafficking risks of particular product or in particular geographical areas.
- Evaluating the modern slavery and human trafficking risks of each new supplier via CSR feedback and onsite visits.
- Ongoing reviews of our supply chain based on our current supply chain mapping of our products/species
- Conducting supplier audits or assessments, when possible through visits conducted by senior management or an appointed agent.

Our suppliers

Our suppliers undergo a supplier approval process by completing our Responsible Purchasing Policy (RPP) and having their supply chain mapped and approved prior to any initial orders being placed. In addition to this requirement for new suppliers we undertake the following actions:

- creating an annual risk profile for each supplier (including current suppliers);
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier procurement policy, including the termination of the business relationship as a last resort.

Performance indicators

We have reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, Tradelink will continue to monitor the following KPIs during 2019.

- 100% action taken on any reported instances of breaches to the Tradelink supplier code
- In 2017, all staff (including supply chain managers and HR professionals) working in identified high risk areas, completed awareness courses and had and had training on modern slavery by watching 'Modern Slavery is closer than you think' as part of their induction. New additions to our staff also completed the same orientation where required.

Training and Capacity building

Training was developed and delivered to relevant staff, including the senior management team with a particular focus on buying practices, recruitment, wages and deadlines for product delivery. Tradelink's Compliance Officer has completed the "END Slavery" training programme and taken part in Workshops focused on the risk of Slavery in the Brazilian Beef & Timber industries.

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

We have continued to raise awareness of modern slavery issues in the organisation by circulating a series of emails and publications. These emails have included information on the following issues related to Modern Slavery:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Breaches of this policy

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

Next steps

Our Group Compliance Officer will continue to orientate the MSA agenda and training programs for Tradelink employees and supplier awareness. Our zero-tolerance approach to modern slavery, all forms of forced labour and any form of human trafficking continues to be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter

Tradelink is committed to improve its policies and procedures to ensure that any risk of modern slavery in the business or supply chains is identified and properly addressed. During the current year we will be:

- reviewing as usual our existing supply chains with focus on modern slavery risk

- Providing refresher courses on key issues to our senior and middle management team over the next 12 months
- Reviewing our policies and procedures and risk assessments to incorporate appropriate references to modern slavery
- Develop best practice requirements in relation to modern slavery issues

Board approval

This statement has been approved by Tradelink's board of directors, who will review and update it annually.

**Signed copy available on
Request**

Date: 15 April 2019

Managing Director:

HERMAN P. SCHEY

SPECIAL NOTE:

This policy statement will be reviewed annually, in line with the financial year, updated as necessary and re-published accordingly. A copy of the Modern Slavery Act 2015 is accessible [here](#)

In accordance with Clause 54(7) of the Modern Slavery Act 2015, a copy of this policy is published on the [Tradelink Website](#)