

## National Windscreens (Replacements) Ltd

### Policy Statement

#### Modern Slavery Act 2015

The Modern Slavery Act 2015 (the 'Act') mandates that National Windscreens (Replacements) Ltd ("National Windscreens") prepares a slavery and human trafficking statement each financial year.

As a business, National Windscreens are committed to ensuring that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking violations in our supply chains and in any part of our business.

Our Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

#### Our business and organisation's structure

National Windscreens is a company that is made up of several member entities from across the UK. As a membership we provide glass replacement and repair services for all vehicle types in the UK. We operate fixed branch services alongside mobile service offerings so that we can serve our customers whenever and wherever it's convenient for them.

The majority of products required for our core activities are within the vehicle glass repair and replacement service.

#### Our supply chain

We maintain close relationships with our suppliers throughout the UK to ensure we can deliver on customer needs and requirements in a timely fashion. We ensure that we only deal with suppliers that share our commitment to ensuring that there is no modern slavery or human trafficking violations in our supply chains or in any part of our business.

#### Our policies on slavery and human trafficking

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 Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

National Windscreens has adopted bylaws (**Bylaws**) which set out the obligations of all member entities when undertaking work on behalf of National Windscreens. These Byelaws include an obligation on the members to ensure compliance with all applicable anti-slavery and human trafficking laws and codes in force from time to time including under the Act. All members are required to certify on an annual basis that they have read and understood the contents of the Byelaws and to confirm their compliance.

The issues surrounding modern slavery and human trafficking have also been added to the National Windscreens staff handbook which is available to all employees. We encourage our people to speak up if they witness any behaviour which concerns them.

We also have a whistle blowing policy in place for any member of our staff to notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future; and raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

## **Due diligence processes for slavery and human trafficking**

National Windscreens takes all reasonable and practical steps to ensure we would never knowingly engage with any suppliers involved in the act of slavery or human trafficking.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

With regards to recruitment, we follow a comprehensive process which involves carrying out appropriate checks regarding everyone's eligibility to work in the UK. All employees follow a structured induction process which includes training on anti-slavery and human trafficking. This induction process details the behaviours we expect of everyone who is employed by us and those whom we partner with. Both we as a business and the people we employ are committed to ensuring that all staff are aware that harassment, discrimination, and bullying are deemed to be unacceptable. We ensure that everyone is treated with respect, that the relationships between our partners and suppliers are based on integrity and honesty; and that we have a sustainable supply chain.

## **Supplier adherence to our values**

We have a zero tolerance to slavery and human trafficking. National Windscreens evaluates its suppliers to ensure they are not engaged in slavery and/or human trafficking within or outside of the United Kingdom. We evaluate all our suppliers on clear and fair policies without bias or favouritism.

All suppliers to National Windscreens are required to comply with the Act or to confirm that they adopt similar practices. Our suppliers are required to fully complete our supplier action document to show their own compliance and commitment towards the Act.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide training to all our staff using e-learning modules. These modules teach staff to recognise the signs of forced labour and human trafficking, as well as what to do if a case of modern slavery is identified in the UK. We also require our business partners as part of our due diligence process to provide training to their staff and suppliers and providers and to certify that this has been completed.

## **Actions undertaken to in assess slavery and human trafficking and manage the risk**

We understand that modern slavery can take many forms throughout the supply chain. For this reason, the issues of modern slavery and human trafficking relating to our business are recorded within our corporate risk register and managed through our risk management framework. This register and framework help us understand all potential modern slavery risks related to our business and to review the effectiveness of our processes and activities being undertaken to combat slavery and human trafficking in our supply chain. Following a review of these processes and activities, we then put in place appropriate strategies which are aimed at ensuring that no slavery or human trafficking is present within our business or supply chains.

## **Measuring our effectiveness**

The potential for Modern Slavery is one of the key risks identified within our risk register. We utilise the metrics from our due diligence activities to develop our strategies for carrying out audits and for verifying the compatibility of suppliers.

**Ongoing Review**

National Windscreens will review annually both its supply chains and external operations and its internal operations to check compliance with the above policy, and to check that our policy is being implemented effectively.

**Statement Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending May 2023. It was approved by the Executive Directors on 10<sup>th</sup> October 2023.

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**Kashmir Sanghera**

*Finance Director for and on behalf of  
the board of directors of National  
Windscreens*