

Slavery and Human Trafficking Statement for the 2019 Financial Year

Introduction

VitrA (UK) Limited is committed to ensuring that all of its business dealings are carried out in full compliance with relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited both within VitrA (UK) Ltd and its supply chains. VitrA (UK) Ltd are committed to improving our practices to combat slavery and human trafficking and are taking steps in the financial year to promote and improve our ongoing commitment to eliminating abuse and exploitation in the workplace as detailed in this statement.

Organisations Structure

VitrA (UK) Ltd is a provider of sanitary ware, bathroom furniture and tiles in the UK. VitrA (UK) Ltd has its registered office in Didcot, England and the company has 46 employees in the UK. VitrA (UK) Limited is a wholly owned subsidiary of the Eczacibasi Building Products Europe Division (EBPE) of the Eczacibasi Group based in Turkey.

Our turnover is currently under £36 million and as a company are therefore not legally required to produce this statement; however, we want to ensure that as an ethical business we comply with legislation regardless of our size.

Our Business

VitrA (UK) Ltd is a wholly owned subsidiary of EBPE and has a devolved management structure, although the group has significant control of our supply chain relating to our products sold, as they are manufactured within the same group.

Our Supply Chains

Our supply chains include manufacturing, primarily of sanitary ware, bathroom furniture and tiles. The group is able to implement due diligence and contractual processes referred to below to give effect to VitrA (UK) Ltd.'s anti-slavery and trafficking policy.

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 due diligence and contractual compliance to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

Due Diligence Processes

VitrA (UK) Ltd is in the process of identifying areas of the business and or supply chain as being areas which carry the highest susceptibility to the risk of employing slave or trafficked labour: all manufacturing processes or other processes where low skilled labour is required or managed.

Suppliers of at risk functions will be asked to complete Vitra (UK) Ltd.'s "Modern Slavery Due Diligence Questionnaire" and where deemed necessary following an analysis of those results, we may choose to exercise contractual rights of audit or require those suppliers to provide statements attesting to their compliance with the Act. We will also monitor our supplier's statements made under s54 of the Act to assess their compliance with the requirements of the Act.

At Head Office level we are researching available training courses for our colleagues and we will commence the delivery of this training, which will alert colleagues to at risk functions, the risks of slavery and human trafficking occurring and how to be alert to its existence in the 2019 financial year.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors support our values on this subject we require our suppliers to abide by Vitra (UK) Limited's anti-slavery and trafficking policy (or their own equivalent) via our contract terms. All colleagues have access to a whistleblowing process which allow them to report any concerns that they may have in a confidential and secure manner.

This constitutes Vitra (UK) Limited's slavery and trafficking statement for the 2019 financial year.

Levent Giray
Managing Director
Vitra (UK) Limited
Date: 10th April 2019

Modern Slavery Due Diligence Questionnaire

Company's Full Name:

Address:

Telephone Number:

Name of main contact:

Mobile number:

Email Address:

<p>1. Does your company have policies and (if applicable) Modern Slavery Act 2015 Statement* that relate to the prevention of modern slavery and human trafficking (if yes please provide copies as supporting evidence)?</p>	
<p>2. Does your company have procedures in place to prevent modern slavery and human trafficking within the business and its supply chain?</p>	
<p>3. Do you include clauses to prevent modern slavery in terms and conditions or as inclusions in your contracts with suppliers (if yes please provide example clauses as supporting evidence)?</p>	
<p>4. Have employees undergone training on the prevention of modern slavery?</p>	
<p>5. Please describe any procedures in place to report instances of modern slavery should they be identified and to support victims in these instances.</p>	