



Keystone Group

Modern Slavery and Human Trafficking Statement 2019/20

Introduction

The Keystone Group is committed to trading ethically, with zero tolerance for modern slavery.

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

This is The Keystone Group's statutory Modern Slavery and Human Trafficking Statement for the period 1 June 2019 to 31 May 2020. The statement will be reviewed and published annually.

About our business and supply chains

The Keystone Group consists of Keystone Lintels, IG Lintels, Keylite Roof Windows, IG Elements, IG Masonry Support Systems, Smartroof, Wyckham Blackwell & Timber Innovations.

With a strong focus on innovation the company has grown to its present position in the marketplace by establishing a reputation for reliable supply of quality specialist products to the construction industry.

We operate across 8 manufacturing/distribution sites: Cookstown - Northern Ireland; Swadlincote – England; Overseal – England; Woodville – England; Hampton-in-Arden – England; Solihull - England Cwmbran – Wales; and Zambrow – Poland.

Policies and due diligence

We have in place systems across our business to:-

- Identify inappropriate employment practices
- Identify and assess other potential risk areas
- Mitigate the risk of slavery and human trafficking occurring
- Protect whistleblowers

Assessing the risk of modern slavery

Our approach to Modern Slavery is consistent with our Values which explicitly include worker health, safety and employment rights. We have reviewed our exposure to risk of Modern Slavery across all aspects of our business, and have focussed on two key areas:

Direct, agency and temporary employment practices; including temporary and agency employment.

All of our direct employees are paid, as a minimum, in accordance with UK legislation and this is kept under review.



We insist that all agency providers are able to satisfy us that staff all have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK.

Material suppliers and service providers; to ensure that all those in our supply chain and contractors comply with our values, we review our agreements with suppliers and contractors to ensure compliance with anti slavery measures.

We are committed to working with suppliers to support necessary improvements, however action is taken *when* suppliers and subcontractors are not prepared to make necessary improvements.

We are pro-active in ensuring that we are addressing any risk and ask our workforce to remain vigilant. We believe the business has a low overall risk of modern slavery in both our own operations and in our supply chain.

Whistleblowing

Employees, sub-contractors or suppliers who become aware of possible unethical or illegal behaviour are to raise the matter with their manager or alternatively refer the matter to a Keystone Group Director.

Training and Awareness

We provide training for all senior management and other key employees, particularly HR and purchasing teams, and raise awareness for all employees through internal communications channels.

Effectively addressing modern slavery risks

We will review our performance in addressing modern slavery risks, and will publish our performance in our annual Modern Slavery Statement.

In forthcoming statements on modern slavery we intend to report on our progress using the following key performance indicators:

- Number of modern slavery cases identified
- Number of whistle-blowing cases raised
- The number of identified key employees trained on Modern Slavery

Our Chief Executive Officer holds overall responsibility for these policies, with accountability held by Group Directors for each business unit.

Eithne Kelly

CEO