



EGL Group



Modern Slavery and Human Trafficking Statement 2023-24

As required by section 54 of the UK Modern Slavery Act 2015, this statement sets out the steps taken by the EGL Group to combat slavery in our own business and our supply chain during the financial year ending 31st March 2024.

The EGL Group Business Activity and Structure

The parent company of the EGL Group is Empress Garland Ltd (company number 04881251) which consists of three privately owned trading companies – (1) EGL Homecare Ltd (01416097) which employs around 220 employees and is based in Shoeburyness, Essex, UK (2) Ramon Holdings Ltd T/A Ramon Hygiene Products (05933693) which employs around 90 people and is based in Leicester, UK and (3) EGL Coral based in Leszno, Poland (50% ownership) which employs around 50 people.

The main business activity of the EGL Group is the manufacture and distribution of a wide range of cleaning products for use in the home and within the janitorial, catering and professional cleaning industries. Customers of the two UK sites include retailers, wholesalers and b2b distributors predominantly based in the UK, whereas EGL Coral serves retail and wholesale customers that are primarily based in Poland and other Eastern European countries.

EGL Group Modern Slavery Position Statement

We recognise the responsibility we share with our suppliers to buy, manufacture and sell products in an ethical manner. We want customers to be confident that the people who make the products we sell are treated fairly with respect for basic human rights, they are kept safe and free from exploitation and that they are not exposed to unsafe working conditions.

Modern Slavery is an abhorrent crime that exists in every part of the world, even the UK where it is estimated there could be as many as 122,000 people in Modern Slavery. Modern Slavery takes many forms including Human trafficking, Bonded Labour and Sexual Exploitation; however, Forced Labour is the most common form of Modern Slavery in the UK.

We strongly oppose any form of Modern Slavery and recognise our responsibility to not only understand the risks of Modern Slavery occurring in our business and our supply chains but also to take practical steps to mitigate those risks.

Assessing Risk

We use various sources and tools to understand Modern Slavery risks including information from The Walk Free Foundation Global Slavery Index (<https://www.globalslaveryindex.org/>) and the Ethical Trading Initiative (<https://www.ethicaltrade.org/>).

However, the primary way we assess risk is through Sedex (Supplier Ethical Data Exchange). As a Sedex AB Member, we are able to identify, assess and manage ethical risks in our own business and our supply chain including our labour providers. Sedex is a global membership organisation that connects businesses all over the world to help improve working conditions in global supply chains using an online platform and a variety of tools and services which give us ethical insight to help us operate responsibly, protect our workers and to source ethically.

We believe that any risk of Modern Slavery taking place in our own business and our first tier suppliers is mitigated through our Modern Slavery strategy, policies and procedures. However, we recognise that there remains a risk of Modern Slavery taking place further down the supply chain where we do not currently have visibility, particularly in relation to high risk countries and industries.

Mitigating Risk - EGL Group Modern Slavery Strategy

“Stronger Together” (S2G) is a multi-stakeholder business-led initiative that aims to reduce modern slavery particularly forced labour, labour trafficking and other hidden third party exploitation of workers. It provides guidance, training, resources and a network for employers, labour providers, workers and their representatives to work together to reduce exploitation. The EGL Group UK sites are committed to implementation of the S2G strategy.

We understand that Modern Slavery issues can only be effectively mitigated if employers and their labour providers understand Modern Slavery issues and work in partnership on these issues with a co-ordinated approach. We therefore choose to work with labour providers who are also committed to implementation of the Stronger Together strategy, and we audit those labour providers ourselves on an annual basis.

Code of Conduct for Ethical Trade

We are fully committed to the minimum standards of our Code of Conduct for Ethical Trade which is a framework of 12 principals based on the Ethical Trading Initiative (ETI) Base Code of labour practice (www.ethicaltrade.org/eti-base-code), which is in turn based on the standards of the International Labour Organisation (ILO). The 12 principals covered by our Code are as follows:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed
10. Entitlement to Work
11. Labour Providers
12. Protection of the Environment

Every two years minimum, each site in the EGL Group has an independent, 3rd party Sedex Members Ethical Trade Audit (SMETA). SMETA uses the ETI Base Code and the local law as its monitoring standards and includes a site tour, confidential worker interviews and a thorough review of documentation. We are fully committed to openness and transparency and are therefore pleased to share these reports in full with our trade customers via Sedex.

Policies

We have established various policies and procedures in our business to help our employees and suppliers understand how to mitigate the risks of modern slavery in our own business and our supply chain. These policies demonstrate a clear commitment to this issue and ensure that appropriate and coordinated action is taken throughout the business. They include:

- Preventing Hidden Labour Exploitation Policy
- Forced Labour Policy
- Eligibility to Work Procedure – this ensures everyone who works with us has a legal right to work in the UK and has not therefore been trafficked into the UK with no legal right to work.
- Harassment and Bullying At Work Policy
- Business Ethics Policy
- Anti-Bribery Policy
- Confidential Reporting Policy and Procedure – including how to report suspected cases of Modern Slavery
- Equal Opportunities Policy
- Freedom of Association Policy
- Grievance Policy
- Supplier Evaluation Procedure

- Supplier Ethical Trading Policy
- Supplier Sub-Contracting Policy

Training

In recognition of the vital role training plays in educating our employees on Modern Slavery, we began to roll out a new Modern Slavery training program for employees during this financial year. Two Directors and four Senior Managers had Stronger Together “Tackling Modern Slavery in UK Businesses” training and one Senior Manager completed the Vital Skills Modern Slavery course.

The EGL Group Supply Chain

Products, raw materials and packaging are sourced from suppliers around the world including: Austria, Belgium, China, France, Germany, Ireland, Israel, Italy, Netherlands, Pakistan, Poland, Spain, Sri Lanka, United Kingdom, United States.

We actively seek to develop long-term trading partnerships with suppliers who are Sedex members; complete the Sedex self assessment questionnaire; and depending on risk and commercial viability have regular independent third party ethical audits that they share with us via Sedex.

In order to improve working conditions at suppliers, the EGL Group have a continuous improvement approach. Therefore if issues are identified during an audit, we work with suppliers to help them resolve those issues within a sensible time frame. However, if very serious violations of the Code of Conduct are identified and the supplier is unable or unwilling to resolve those issues it will in due course lead to termination of the business relationship.

To assist suppliers who are still at the early stages of their Ethical Trading journey and may be unfamiliar with Modern Slavery issues, the EGL Group have also published a Supplier Ethical Trading Guide.

Suppliers of finished products and raw materials are asked to accept in writing contractual terms of trading which include a clause on compliance with the Modern Slavery Act. They are also asked to provide a signed policy declaration confirming compliance with relevant policies.

This statement was approved by the EGL Group Board on 31st August 2024

This statement has been signed on behalf of the board by:



Terry Dearlove
EGL Group Managing Director
31st August 2024