

## **Introduction**

This statement sets out Triton's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2019 to 31 March 2020.

Triton recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

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

## **Organisational Structure and Supply Chains**

This statement covers the activities of Triton Showers:

- Triton Showers is the UK's market leading manufacturer of electric and mixer showers and associated accessories. Based in Nuneaton, Warwickshire, products are designed, manufactured, assembled and tested for the UK and overseas markets using the highest quality of components sourced from suppliers based in the UK, across Europe and the Far East.

## ***Countries of Operation and Supply***

The organisation currently operates in the following countries:

Triton Showers is a division of Norcros Group (Holdings) Limited. It manufactures at the UK head office in Nuneaton. Triton also have a Representative Office in China where components are sourced directly from across the Far East for supply back to the UK.

## **Responsibility**

**Responsibility for the organisation's anti-slavery initiatives is as follows:**

**Policies:** Triton's Managing Director and HR Manager have overall responsibility for ensuring that our policies are consistently reviewed, compliant and relevant to the business and employees.

**Training:** HR Manager is responsible for ensuring that all training is delivered to the appropriate departments and senior management team. This year awareness training has been delivered to the senior management team.

## **Relevant Policies**

The organisation 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:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Ethical policy** Shows our commitment to producing quality products in a manner that demonstrates sound business ethics. We endeavour to adhere to the principles within the ETI Base Code.

## Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

### Labour Suppliers [Temporary Workers]

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Planned and ad-hoc audits are carried out with the Labour Supplier throughout the year to ensure continued compliance to our requirements.

### Supply Chain

- Initial desk top audits (DTA) are conducted prior to commencement of negotiations
- Agreement to supply is only granted once initial DTA and satisfactory on-site visit have been completed. New suppliers must agree to our Supply Level Agreement.
- On-going audits are agreed with all suppliers and this includes compliance with the Modern Slavery Act

## Training/Awareness-Raising Programme

Triton's Modern Slavery training/awareness presentation covers the following:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected within the organisation or our supply chains;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters obtained from 'Stronger Together' and the ETI across the organisation's premises and circulating a series of awareness emails to staff.

The posters and emails explain to staff select the relevant issues from the list below:

- 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.
- Posters issued are issued in English, Polish, Lithuanian and Chinese

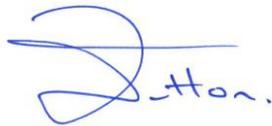
#### **Actions Taken During This Financial Year**

- *Audits of our temporary worker suppliers*
- *An update to the independent whistleblowing hotline, allowing e-mails as well as calls*
- *Training for all our Senior Management Team*
- *A e-learning platform for all line managers for Modern Slavery awareness.*

#### **Managing Director Approval**

This statement has been approved by the organisation's Managing Director who will review and update it annually.

Signed:



**Date: February 2021**