

Principal Doorsets Ltd

Modern Slavery Act 2015 Statement

January 2024

Introduction

Principal Doorsets Ltd (PDL) a privately-owned business, is a leading timber doorset, joinery ancillary and integrated ironmongery manufacturer operating across a range of sectors, including education, healthcare, residential, commercial, leisure, and defence. The Company was founded in August 2014 and is based in North Devon, United Kingdom. We purchase from the UK from reputable companies that have achieved and continue to maintain third party accreditation. A great many of their goods are purchased from around the world from locations that have a greater risk for slavery. We recognise that some countries have an identified risk of slavery and human trafficking being prevalent and we therefore regularly appraise our supply chains to ensure that such activities are not being carried out.

The UK Modern Slavery Act came into force in October 2015 and requires suppliers of goods or services with an annual turnover of £36 million or more to publish a statement detailing their steps to ensure that there is no slavery or human trafficking in its business or supply chains. Principal Doorsets Ltd is therefore required to publish such a statement annually. This statement relates to our business activities during our financial year ending 31st December 2023.

Our Policies

We have several policies which are designed to manage the risks relating to modern slavery and human trafficking issues, including our Code of Conduct, the Whistleblowing Policy and the Anti-Slavery and Human Trafficking Policy.

We are committed to preventing slavery and human trafficking in any part of our own business activities and those of our supply chain. The company will not tolerate the use of child or forced labour, nor exploitation of children in any of its operations and facilities. We have therefore adopted a 'zero-tolerance' approach to all elements of modern slavery in all its forms and we will investigate any alleged breaches immediately. Should any individuals or organisation with whom we carry out business be found to be in breach of our policy, their partnership with us will be suspended, until a full investigation has been carried out by our directors.

These policies confirm our 'zero tolerance' approach to modern slavery and human trafficking in our business and supply chain. We are committed to acting ethically and with integrity and to maintaining systems and controls which are designed to prevent modern slavery and human trafficking from taking place in our business or across our supply chain. Our Whistleblowing Policy provides a mechanism for our employees and others working in our supply chain to report suspected breaches of these policies.

The risks relating to modern slavery and human trafficking can apply anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of goods and materials. We expect our suppliers and sub-contractors to ensure that there is no slavery or human trafficking taking place in their supply chain.

If issues are identified, (including through our audit process) which are not resolved to our satisfaction, we review the relationship with the relevant organisation.

All potential and existing suppliers must comply with our Responsible Purchasing and our Anti-Slavery policies. We regularly appraise all our suppliers to ensure their compliance and we operate a due-diligence system with assistance from organisations such as, the UK Timber Trade Federation (TTF) & Forest Stewardship Council. We require compliance with our Responsible Purchasing Policy (RPP).

Principal Doorsets operate the FSC® Chain of Custody for 'certified' products which account for over 98% of our sales. The FSC® certification schemes contain strict requirements upon the restriction of forced labour within any accredited Companies. Both standards refer to the International Labour Organisation Fundamental Principles and Rights at Work 1998. We have held FSC® Chain of Custody since 2014 and we are audited annually by a third party who are registered within a United Kingdom Accreditation Service to ensure our continued compliance with the requirements of the relevant Standards.

Further information is available using these links:

<https://www.gov.uk/government/collections/modern-slavery>

<http://stronger2gether.org/>

A Statement has been approved by the Board of Directors of Principal Doorsets Ltd.

Signed on behalf of Principal Doorsets Ltd.

Our approach to assessing and managing risk

1. We have a policy confirming our 'zero tolerance' approach to modern slavery and human trafficking.
2. Our policies require that our suppliers acknowledge their responsibility for adhering to our policies relating to modern slavery and human trafficking.
3. We undertake periodic risk assessments to identify the key risks in our business and supply chain.
4. We have issued minimum procurement standards for certain high-risk categories of materials and products. We keep these standards under review.
5. Our contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-Slavery and Human Trafficking Policy.
6. Our policies require our suppliers to complete an assessment to confirm that they comply with PDL's 'zero tolerance' approach to modern slavery and human trafficking.
7. We undertake checks on new recruits to ensure that they are eligible to work in the relevant country of employment.
8. We continue to deliver training to employees on the risks of modern slavery and human trafficking and how to take steps to mitigate these.
9. We monitor the effectiveness of our actions against the risk of modern slavery and human trafficking, for example by reviewing our policies and our procurement standards and implementing an audit programme (see point 10 below).
10. We undertake audits of certain key supply chain partners to assess their controls and learn from best practice. We undertake detailed reviews of a sample of those audits.

Next steps

We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking.

Next steps will include:

1. Continuing to review and update our Anti-Slavery and Human Trafficking Policy (and related policies) and the related procurement standards.
2. Continuing to review our pre-qualification standards for the appointment of new suppliers and subcontractors.
3. Continuing to train employees on identifying potential modern slavery or human trafficking within our operations and supply chain.
4. Continuing to assess the risks of modern slavery and human trafficking in our business and our supply chain.
5. Completing the follow-up actions arising from the review of the procedures adopted by our principal provider of temporary labour.
6. Developing KPIs to assess the effectiveness of our management of the modern slavery and human trafficking risks associated with our business.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes PDL's modern slavery and human trafficking statement. It was reviewed and approved by PDL's board of directors on 03 January 2026

Signed on behalf of the board of directors of PDL by:



Rob Llewellyn

Managing Director