



Summit Timber :

Modern Slavery and Human Trafficking Statement : January 2026

1. Introduction

This Modern Slavery and Human Trafficking Policy and Statement is made pursuant to section 54 of the Modern Slavery Act 2015. It sets out the actions taken by Summit Timber Group Ltd and its subsidiary companies (together referred to as “the Group”) to prevent modern slavery and human trafficking within our business operations and supply chains.

Summit Timber Group Ltd is committed to conducting business ethically, responsibly, and transparently. We recognise our responsibility to respect human rights and are committed to preventing slavery, servitude, forced or compulsory labour, and human trafficking in all parts of our business and supply chains.

2. Our Business

Summit Timber Group Ltd is a UK-based timber manufacturing and distribution group, operating through its subsidiary Operating Companies. The Group supplies timber products including mouldings, stair parts, decking, and woodturning products to customers across the UK.

Our principal operations, workforce, and supply chain are primarily UK-based. However, we recognise that risks of modern slavery can exist within global supply chains connected to the timber and manufacturing sectors.

3. Our Commitment

The Group has a zero-tolerance approach to modern slavery and human trafficking. We are committed to:

- Acting ethically and with integrity in all business relationships
- Upholding human rights and fair working practices
- Implementing effective systems and controls to prevent modern slavery
- Working collaboratively with suppliers and partners to improve transparency
- Ensuring concerns can be raised safely and without fear of retaliation



The Board of Directors has overall responsibility for this policy. Senior management are responsible for its implementation, monitoring, and ensuring that employees receive appropriate training.

4. Policies Supporting This Statement

The Group maintains a range of policies that support our commitment to preventing modern slavery and human trafficking, including:

- Modern Slavery and Human Trafficking Policy (this Policy).
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Harassment and Bullying Policy
- Supplier Code of Conduct / Purchasing Policy

These policies are communicated to employees and relevant third parties and are reviewed regularly.

5. Due Diligence and Supply Chain Management

The Group takes a risk-based approach to due diligence within its supply chains. Measures include:

- Conducting due diligence checks on new suppliers, including self-assessment declarations
- Expecting suppliers and contractors to comply with all applicable labour, employment, and human rights laws
- Requiring suppliers to adhere to our Supplier Code of Conduct / Responsible Purchasing Policy.
- Prioritising suppliers who can demonstrate ethical sourcing and labour practices
- Encouraging adoption of recognised standards such as the Ethical Trading Initiative (ETI) Base Code
- Seeking evidence of third-party ethical audits where appropriate

Our core supply chain is largely UK-based; however, additional scrutiny is applied where suppliers operate in higher-risk countries or sectors.



6. Risk Assessment and Management

The Group Companies regularly assesses the potential risk of modern slavery within their individual operations and supply chains. This includes:

- Reviewing supplier locations, sectors, and labour practices
- Monitoring external indicators of modern slavery risk
- Conducting online risk reviews and supplier audits annually
- Prioritising higher-risk suppliers for enhanced engagement and monitoring

Where risks are identified, appropriate action is taken, which may include corrective action plans, increased monitoring, or termination of the business relationship.

7. Training and Awareness

To ensure understanding of modern slavery risks, the Group provides:

- Training for managers and employees involved in recruitment, procurement, and supplier management
- Modern slavery awareness as part of employee induction
- Ongoing communication regarding expected standards of behaviour and reporting procedures

Managers are responsible for ensuring their teams understand and comply with this policy.

8. Reporting Concerns and Whistleblowing

The Group encourages employees, suppliers, and other stakeholders to report concerns related to modern slavery or human trafficking. Reporting channels include line management and the Whistleblowing Policy.

All reports are taken seriously, investigated appropriately, and handled confidentially. The Group is committed to protecting whistleblowers from victimisation or retaliation.



9. Measuring Effectiveness

The effectiveness of our approach is monitored through key performance indicators, including:

- Right-to-work checks and labour documentation audits
- Payroll and working hours monitoring
- Supplier engagement and audit outcomes
- Review of policies, codes of conduct, and supply chain practices
- Ongoing communication with suppliers and partners

Findings are reviewed by senior management and used to drive continuous improvement.

10. Continuous Improvement

The Group is committed to continually improving its approach to tackling modern slavery. Future priorities include:

- Strengthening supplier due diligence in higher-risk areas
 - Increasing supplier transparency through independent third-party audits
 - Enhancing employee training and awareness
 - Regular review and enhancement of policies and procedures
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11. Approval

This statement has been approved by the Board of Directors of Summit Timber Group Ltd and is reviewed annually.