



Modern Slavery Statement

2024

Organisation

This statement applies to Greenmill Supply Company Ltd (referred to in this statement as Greenmill). The information included in the statement refers to the financial year 2023

Organisational Structure

Greenmill is a family owned business specialising in supply products and materials into the Air Conditioning sector of the HVAC market.

The Head Office, based in Colchester, Essex, is the base for 66 employees in Sales, Purchasing, Marketing, IT, Customer Experience, HR and Finance departments. The distribution of products operates out of a site in Bedford, Bedfordshire and is the base for 41 warehouse, delivery, H&S and site-specific HR employees.

Greenmill is headed by the CEO and the Managing Director. Formed in 2000, Greenmill are a supply and distribution company, with a company motto of “In Stock, On Site, On Time” striving to give the best availability and best customer service in the market.

Greenmill supply all installation materials for the Air Conditioning market, from Copper pipe to extraction ventilation, across Great Britain. Greenmill sell through email, telephone and via its website. There are no retail outlets and demand is fairly consistent throughout the year.

The labour supplied to Greenmill in pursuance of its operation is carried out in predominantly in the UK.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

Greenmill acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Greenmill understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Greenmill does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Greenmill in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Greenmill strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

Supply Chains

Greenmill sell a mixture of branded products and through the Störnch brand which it owns. In order to fulfil its activities, the main supply chains of Greenmill include those related to Air Conditioning products, with international production sites, namely United States of America, United Kingdom, Europe, India, Vietnam, China and Taiwan.

Greenmill predominantly trade, in excess of 90% of goods sold, with companies based in the UK who import on our behalf, whilst directly importing a small amount of Störnch ourselves. We understand that first-tier suppliers, including branded products, are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Potential Exposure

Greenmill considers its main exposure to the risk of slavery, human trafficking and poor working conditions to exist through production sites in developing parts of the world where protection against breaches of human rights may be limited.

In general, Greenmill considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Performance in 2023

Greenmill purchases have grown significantly over the past few years and focus has been on meeting demand. The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

For branded suppliers we use reputable companies who have their own policies and procedures to reduce exposure to slavery, human trafficking and poor working conditions.

For Störnch branded products, Greenmill endeavour to use factories from countries with lower risk of human rights breaches although Greenmill acknowledges that more could be done in the future.

Greenmill has appointed a new Head of Sourcing for 2024 who will be responsible for creating a strategy to reduce exposure further.

Focus for 2024

Greenmill is actively undertaking a strategy to improve the due diligence in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

In accordance with section 54(4) of the Modern Slavery Act 2015, Greenmill will taken the following steps to ensure that modern slavery is not taking place:

- Identifying and assess all potential risks in current supply chain
- From January 2024 Greenmill have entered into a long term relationship with Sedex; a global business specialising in supporting business to reach sustainability goals and reduce risk in the supply chain
- In person inspections of every site producing Störnch branded products
- Creating new Goods for Resale (GFR) terms and conditions to allow termination of trading in the event that the supplier is, or is suspected, to be involved with modern slavery
- All new production sites to be assessed prior to creating a trading relationship
- All existing production sites to be assessed with a view to registered with Sedex by the end of 2025
- All Greenmill employees involved with procurement to undergo Ethical Sourcing & Anti Bribery training
- Introduce a new Employee Code of Conduct
- Introduce a new recruitment policy

Key Performance Indicators

Greenmill has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in its supply chains.

- A GFR Terms and Conditions contract to be created
- All Störnch branded products production sites to be visited in person and inspected
- Any new production sites will be inspected and assessed prior to trading and will conform with GFR terms and conditions
- Introducing all existing suppliers to the Sedex platform with a view to having all sites certified by the end of 2025.

Policies

Greenmill has the following policies which further shape how its stance on modern slavery: Colleague Handbook, Equal Opportunities & Discrimination, Anti Bullying & Harassment, Whistleblowing.

This statement has been compiled by the Procurement Team and has been authorised and approved by the CEO. This report is reviewed and published annually.

A handwritten signature in black ink, appearing to read 'N. Miller'.

Date of approval:

August 2024