

## Introduction

This statement outlines the actions of Landguard Point Ltd to identify and mitigate any potential risks of modern slavery associated with its business operations. It details the measures taken to ensure that slavery and human trafficking are not present within the company or its supply chains. This statement pertains to activities and actions during the financial year from 1st May 2024 to 30th April 2025.

As a company involved in timber trading, Landguard Point Ltd acknowledges its responsibility to combat slavery and human trafficking robustly. The company is fully committed to preventing these practices in all its business activities and ensuring that its supply chains are free from such abuses.

## Organisational Structure and Supply Chains

This statement pertains to the activities of Landguard Point Ltd: The company operates as a timber trading enterprise, encompassing two sites in the UK. Its primary activities include the import and distribution of timber products, sourced both domestically and internationally.

The company operates directly in the United Kingdom.

To assess whether particular activities or regions are at high risk for slavery or human trafficking, the company uses the Corruption Perceptions Index (CPI) and other public information sources. Additionally, a thorough due diligence process is conducted for all supply chains originating outside of the EU.

The following activities are identified as high-risk for slavery or human trafficking: logging operations and manufacturing processes in certain countries.

## Responsibility for Anti-Slavery Initiatives

### Policies:

Landguard Point Ltd maintains written contracts with its suppliers, requiring them to sign and return documents that confirm their receipt, understanding, and compliance with the Modern Slavery Act 2015.

### Investigations/Due Diligence:

Part of the due diligence process is outsourced to Track Record Global to ensure independent oversight. The company also seeks materials certified under internationally recognised forest

certification and chain of custody schemes, which enforce stringent due diligence processes to prevent slavery and human trafficking and comply with ILO Conventions. These organizations also engage with labour unions, social unions, and NGOs.

Awareness of legislation, policies, and requirements is communicated throughout the supply chain and directly to the company's staff.

## Organisational Policies

### Whistleblowing Policy:

The company encourages all workers, customers, and business partners to report any concerns related to its direct activities or supply chains, including any risks of slavery or human trafficking. The whistleblowing procedure, detailed in the Employee Handbook, ensures that disclosures can be made without fear of retaliation. Customers and others with concerns can expect confidential and sensitive handling of their information.

### Employee Code of Conduct:

Landguard Point Ltd.'s code of conduct sets clear expectations for employee behaviour and actions when representing the company. It emphasises the maintenance of high standards of conduct and ethical behaviour, particularly in international operations and supply chain management.

### Procurement Code of Conduct:

Landguard Point Ltd is dedicated to ensuring its suppliers uphold the highest ethical standards, including providing safe working conditions, treating workers with dignity and respect, and acting lawfully and ethically. Suppliers are required to meet these standards and improve working conditions as necessary. Serious violations of the supplier code of conduct will result in termination of the business relationship.

### Due Diligence

The company conducts extensive due diligence when onboarding new suppliers and regularly reviews existing suppliers. This includes mapping the supply chain to assess risks of modern slavery, conducting regular supplier audits. Steps are taken to improve substandard practices, and sanctions, including termination of the business relationship, are applied to suppliers who fail to comply.

### Training

All staff, including those involved in supply chain management and HR, are required to complete training on modern slavery as part of the company's broader human rights and ethical trade program. As directed on [Modern slavery training: resource page - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Modern_slavery_training_resource_page.pdf)

### Awareness-Raising Program

In addition to staff training, Landguard Point Ltd raises awareness of modern slavery issues through regular email communications. These emails explain the basics of the Modern Slavery Act 2015, how to report concerns, and what external help is available, such as the Modern Slavery Helpline.

### Board Approval

This statement was approved on 1st July 2024 by the board of directors of Landguard Point Ltd and is reviewed and updated annually.