



## **Modern Slavery Act 2015**

### **Introduction**

This statement sets out Tarkett Ltd. 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. As part of manufacturing industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. This statement relates to actions and activities during the financial year [1 April 2016 to 31 March 2017].

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

### **Our business and structure**

- Tarkett Ltd is a French owned world-wide flooring manufacturing company. Tarkett's main shareholders are the Deconinck Family (50.2%) and KKR International Flooring and a public float. The group enjoys a stable financial base. Shareholders are engaged and they support Tarkett's profitable growth strategy. Tarkett is legally structured with a Supervisory Board, a Management Board and an executive Committee
- Tarkett Group Governance is aimed at ensuring uncompromised business ethics, robust and transparent corporate supervision, risk management and regular dialogue with shareholders.

### *Countries of operation and supply*

The organisation currently operates in the following areas of the world

- EMEA
- Eastern Europe
- North America
- Latin America
- Asia-Pacific areas

### *Risk Management*

Risk Identification and risk management are among the issues reviewed by the Supervisory Board, the Executive Committee and the Audit Committee. In 2012, Tarkett updated its risk mapping and continued to implement action plans, significantly reducing risk exposure.

### *Responsibility*

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

- **Policies:** Both Group & Local HR are responsible for putting in place and reviewing policies and the process by which they were developed.
- **Risk assessments:** Local HR wholeheartedly welcome the introduction of the Modern Slave Act 2015. This legislation is a crucially important development in tackling slavery and human trafficking and we will not trade or partner with any business or organisation which is involved in the practice however remotely or indirectly
- **Investigations/due diligence:** All individual and individual departments have a role to play in investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. Any suspicion that goes against the Modern Slavery Act 2015 should be reported to HR Department
- **Training:** HR Manager & Health & Safety Consultant has attended training on Modern Slavery Act 2015 to assist with identifying slavery and human trafficking risks

### 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 [select the relevant policies from the list below and include links to the full text]:

- **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. Employees, customers or others who have concerns can contact HR Department
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. All employees receive Code of Conduct e-learning.
- **Supplier/Procurement code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship
- **Recruitment/Agency workers policy** 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.
- **Any other policies relevant to the organisation's business or sector** Corporate Social Responsibility Policy, Bribery Act e-learning

### 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:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- creating an annual risk profile for each supplier;
- using, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.

## **Training**

We will continue to keep our staff informed and raise awareness of how to recognise and respond to indicators of human rights abuses.

The organisation's modern slavery training will cover:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- 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;
- 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 and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- 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.

## **Awareness-raising programme**

As well as training staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises.

The posters explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- what external help is available, for example through the Modern Slavery Helpline.

## **Board/Member approval**

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