

Norbord Europe- Annual Statement 2019 – Modern Slavery

Introduction

This statement is published in accordance with the Modern Slavery Act 2015. It summarises the steps taken by Norbord Europe Ltd to prevent Modern Slavery and Human Trafficking occurring within our Business or Supply Chain.

Norbord Europe Ltd are committed to ensuring that our business interactions with all parties are conducted in line with our Business Code of Conduct and as such treat customers, suppliers and employees with integrity and respect at all times. We are committed to the elimination of Slavery in any form.

Modern Slavery is the exploitation of people who have been forced, deceived, or coerced into a life of labour and servitude. It is a crime hidden from society where victims are subjected to abuse, inhumane and degrading treatment. It can take many forms.

Organisation's structure

Norbord Europe Ltd is part of the Norbord Inc Group, we are an international producer of wood-based panels, we manufacture OSB in the United States, Canada and Europe. In addition, we manufacture MDF, Particleboard and furniture in Europe. We manufacture OSB in the United States, Canada and Europe. In addition, we manufacture MDF, Particleboard and furniture in Europe.

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We have a European annual turnover of £334m (2017). 2018 figure will be available soon.

Our business

Our business has 2 OSB mills (Inverness and Genk), 2 Particle Board Mills (Cowie and South Molton), 1 MDF Mill (Cowie) and a furniture factory at South Molton.

Our people

We have reviewed our Recruitment Policy and retrained all employees and Recruiting Managers on the importance of face to face checks with original copies of right to work documents.

We have also upskilled the HR Team in how to identify fraudulent documents. We have set our expectations with Strategic Agency Partners for Temp staff and have asked them to do the same. We have recently set up and reviewed a UK wide PSL for Recruitment and in addition ensure compliance with Agency Worker Regulations.

We have updated our Personal Details Form to ensure it includes Bank Account Name and any anomalies are flagged and investigated where the primary account is different.

We have this year updated our Nortrain system to encapsulate our Modern Slavery Act Commitment Statement. All supervisors also completed external training.

Our supply chain

Our supply chains includes a large number of suppliers who all must comply with the Modern Slavery Act and are subject to **pre-qualification** checks including disclosure of the following:

- Any previous offences under the Modern Slavery Act 2015 (an “MSA Offence”);
- Any previous investigations they have been subject to relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015;
- any knowledge that a member of their supply chain could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015.

Our supply chain agree that they will:

- Notify the Company promptly in writing if it becomes aware or has reason to believe that it, or any of its affiliates, officers, employees, agents or subcontractors have breached or potentially breached any of the Supplier’s obligations under this Condition. Such notice shall set out full details of the circumstances concerning the breach or potential breach of Supplier’s obligations.
- Conduct a programme of regular training for its affiliates, officers, employees, agents, subcontractors and other members of its supply chain to the extent required for its compliance with the Modern Slavery Act 2015.
- Keep a record of all training offered and completed by its affiliates, officers, employees, agents, subcontractors and other members of its supply chain to the extent required for its compliance with the Modern Slavery Act 2015 and shall make a copy of any such records available to the Company on request.
- Indemnify, defend and hold harmless the Company and its directors, officers and employees in full and on demand from and against any and all liabilities, claims, fines, demands, damages, losses or expenses (including legal and other professional adviser’s fees and disbursements), interest and penalties incurred by them resulting from a breach by the Supplier of the Modern Slavery Act 2015.
- Fully understand that any breach of this Condition by the Supplier shall be deemed a material breach of the Contract and shall entitle the Company to terminate the Contract in accordance with Condition 48.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. To date no issues have been identified.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we conduct due diligence checks which were detailed above and include systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers. We have a dedicated Whistleblowing Hotline which has been in operation for a number of years and all employees are made aware of this at their induction. They can make contact in three ways: Phone call, website or email.

Supplier adherence to our Values and Ethics

We have zero tolerance to Slavery and Human Trafficking. To ensure all those in our supply chain and contractors comply with our Values and Ethics we have in place a rigorous supply chain compliance programme as previously detailed.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all our staff via tool box talks and poster campaigns. Line Managers are asked to take additional training as are the Purchasing and HR Teams.

Our effectiveness in combating slavery and human trafficking

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking: Update Nortrain to include line manager training, employee awareness of Modern Slavery for completion on a yearly basis, incorporate checks for and red flags in our supply chain as part of our Supplier Audits.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Norbord Europe's Slavery and Human trafficking statement for the financial year ending April 2018.



Alan McMeekin
Senior Vice President/Managing Director of Norbord Europe

Date: