

## Modern Slavery Act Statement 2022/23

### Introduction

James Halstead plc and subsidiary companies (The “Group”) recognise their responsibilities pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and this statement sets out the measures taken to prevent acts of modern slavery and human trafficking within its business and supply chains during the year ending 30 June 2022.

The Group has a zero-tolerance approach to modern slavery and human trafficking, and this is part of our broader commitment to conduct our business in an ethical and lawful manner.

### Our Business and Supply Chain

James Halstead plc is a major international Group of companies that manufactures and distributes notable brands in the commercial, contract and consumer flooring sector employing over 820 staff worldwide. It has a global reputation for quality products, service and after sales support.

The Group’s global supply chain includes the sourcing of raw materials for our manufacturing processes, key suppliers of finished products and other third-party providers of goods and services required in the operation of our business. We work with a core of well-established and reputable suppliers with whom we have developed long-term business relationships.

### Our Policy on Slavery and Human Trafficking

We will never knowingly support or deal with a business involved in slavery or human trafficking. To ensure that we are conducting business in an ethical, lawful, and transparent manner we have several policies in place which we adhere to and apply, including:

- The Whistleblowing policy, which encourages employees and others to report any suspicions they may have relating to slavery or human trafficking issues without fear of victimisation, subsequent discrimination, reprisal, disadvantage, or dismissal and safe in the knowledge that their concerns will be fully investigated and acted upon if founded.
- The Corporate Social Responsibility Policy expresses our fundamental values and represents a framework of our existing operating principles and outlines basic standards of conduct for our employees and suppliers. We believe that a commitment to the principles of corporate social responsibility makes good business sense and complements our core business strategy and corporate values
- The Recruitment Policy includes confirming eligibility to work in the country of employment and to ensure everyone employed is of legal working age.

There is an undertaking to deal only with those suppliers who share and uphold the same principles as James Halstead plc and who can demonstrate that they have a long-term commitment to ensuring that slavery and human trafficking does not exist in their supply chains.

## Due Diligence

Our biggest risk of exposure to modern slavery is in the raw material and product supply chains. The Group seeks to obtain competitive prices for goods and services, however there is a commitment to ensure that suppliers have not infringed human rights and adhere to the highest standards of ethics the Group demands.

To mitigate the exposure to modern slavery, all supplier's factories and sites are subject to due diligence checks in the form of audits conducted by or on behalf of the Group. Where it is not possible to physically attend, meetings are held digitally on a frequent basis, with suppliers from around the world.

In furthering our commitment to taking a zero-tolerance approach to modern slavery and human trafficking, we require our existing suppliers on an ongoing basis to make positive written affirmations on a regular basis that:

- (i) they do not; and,
- (ii) their direct supply chain does not, endorse, enable or facilitate human trafficking or slavery within their business.

This requirement has been incorporated into the supplier procurement process.

The Group's standard terms and conditions for suppliers include an express obligation that they comply with applicable anti-slavery and anti-human trafficking legislation.

Staff are trained on how to recognize and respond to indicators of human rights abuses.

## Our Performance Indicators

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in our business or supply chain: the internal and external audit process; the monitoring of Human Resource and payroll systems; and direct communication and written affirmations with our suppliers ensuring the understanding of, and compliance with, our expectations.

## Consequences

We will continue to inform our suppliers that the Group operates a zero-tolerance to human trafficking and/or slavery and we expect these standards to be respected and implemented at their sites. If an existing supplier or a potential new supplier fails to cooperate with our requests, or we find evidence of human trafficking and/or slavery in our supply chain, we will immediately seek to terminate our relationship with the relevant supplier.

## Approval

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Directors who will review and update it annually as appropriate.

Signed by:



For and on behalf of the Board  
October 2022