Slavery and Human Trafficking Statement

What this Policy Covers

Slavery and Human Trafficking remain a hidden blight in our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Policy statement

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all of its suppliers, contractors and other business partners and expects that its suppliers will in turn hold their own suppliers to the same standards. Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse, and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. This policy applies to all individuals working for the Company. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Responsibility for the policy

The Senior Management Team has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. The Managing Director has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Our Commitment

The company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking is not taking place in any business or organisation that has any sort of business relationship with our company.

Due diligence processes for slavery and human trafficking

The company has zero tolerance for slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk, the company has systems to encourage reporting concerns and protecting whistle-blowers.

Our supply chain providers are expected to have suitable anti-slavery and human trafficking policies and processes. These checks form part of the Company's supplier onboarding process and are reviewed periodically.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy. If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it

with your line manager. You can also contact the Government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

Potential exposure

The Company assesses the risk of modern slavery within its own operations to be low; however, it recognises that potential risks may exist within its supply chains and therefore takes appropriate steps to mitigate those risks. 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.
The company considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains and therefore the company follows the following steps to minimise that potential risk.

Steps

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with slavery and/or human trafficking.
In accordance with section 54(4) of the Modern Slavery Act 2015 (the Act), the company has contacted (or attempted to contact) all first-tier suppliers to set out our zero-tolerance stance on modern slavery and to ensure that slavery and/or human trafficking is not taking place.
The company has taken action to monitor reports of modern slavery and cross-referenced such reports with our first-tier supply chain. The company will seek to discontinue business with any first-tier supplier found by the enforcement authorities to be involved in modern slavery.
The company encourages the use of its whistleblowing policy to report any concerns regarding modern slavery and will investigate any complaints thoroughly.

Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and has been trained accordingly.
All employees receive an induction into the business where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking

The company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains:
Use of labour monitoring, right-to-work documentation, and payroll audits
We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

Assessment of effectiveness in combatting modern slavery

To ensure effectiveness in combatting modern slavery, the company maintains an accurate supplier list including contact details. It will ensure action is taken in response to reports of modern slavery in its supply chains and any complaints made via the whistleblowing policy will be responded to in accordance with the policy.
Following a review undertaken for the company's statement of the previous financial year, the company confirms its supplier list is up to date for the current financial year.
As in the previous financial year, there have been no reports that any of the company's suppliers have been involved in activities covered by the Modern Slavery Act.

Our business and supply chains

The Company is a leading UK-based organisation providing high-quality, sustainably sourced internal doors, hardware, and accessories. The Company operates primarily within the United Kingdom.

Our supply chains mainly consist of professional services providers, recruitment and employment-related services, IT and software providers, and facilities and office services. The majority of our suppliers are UK-based.

The Company recognises that, while the risk of modern slavery is lower in these sectors than in some others, no organisation is entirely risk-free.

Director

The Company has a director, to whom all concerns regarding modern slavery should be addressed. The Director works with the HR Department and the Compliance Department to undertake an annual review of the company's obligations towards eradicating modern slavery within its organisation and supply chains both within and outside of the UK.

Review

This statement pursues Section 54(1) of the Modern Slavery Act 2015 and applies to all companies within and associated with the company. This statement is published on the Company's website and is reviewed annually in line with the financial year.

Reporting Suspicions of Slavery

Employees can report any suspicions of slavery either through the Public Interest Disclosure (Whistleblowing) policy, anonymous reporting form https://forms.office.com/e/ADqD5R7a5q or externally to the Modern Slavery Helpline. Details are set out below:
https://modernslavery.co.uk/contact.html
0800 0121 700

This statement was approved by the Board of Directors of the Company and relates to the 2024/2025 financial year:

Mike O'Toole
Managing Director
17/01/2026