



Modern Slavery Act

Transparency Statement 2024

Published 2025



Introduction

This Highbourne Group Modern Slavery Transparency Statement has been published in accordance with the Modern Slavery Act 2015, in relation to the financial year ending 31st December 2024. It details the steps we are taking to seek to prevent Modern Slavery and Human Trafficking in our business and supply chain, as well as future planning to implement preventative measures. We aim to show continuous improvement and progress in addressing risks to enable transparency throughout our business and supply chain.

We believe in making homes, businesses and lives better and it's essential we do this in the right way. We have a responsibility to ensure that we act with integrity and behave ethically in everything we do at the Highbourne Group and we are aware of the potential risk of modern slavery in the manufacturing of our products. We aim to promote fair and ethical practices, behaviours and positive working conditions in our business and supply chain to ensure the welfare of workers and protect their rights.

At the Highbourne Group, we respect human rights and do not tolerate any form of slavery in our business or supply chain.

Our Businesses and Supply Chain

The Highbourne Group is one of the UK's largest plumbing and heating merchants and comprises City Plumbing Supplies, PTS, DHS, NSS, The Underfloor Heating Store, PlumbNation and Plumbworld. We sell and distribute plumbing, heating and bathroom products to trade, DIY and contract customers. We are a major supplier for new build, social housing and repairs and maintenance markets, both in residential and commercial sectors. Our team of over 3,500 colleagues operates from more than 350 branches and sites around the UK.

We work with suppliers across many countries to source products that meet internationally recognised ethical standards. There are over 6,000 Exclusive Brand products sourced from more than 150 manufacturing sites across the world with approximately 20% classed as Direct Sourced. We have processes in place to regularly review and assess the operations of all our suppliers, as outlined in this document.

Policies and Controls on Modern Slavery

We have clear policies and standards on human rights and modern slavery, which are reviewed and updated regularly and approved by the Senior Leadership Team.

Our business is focussed on supporting our customers and exceeding their expectations, from providing first class service to sourcing products and materials from our suppliers in a responsible and sustainable way. Everything we do is underpinned by the four Behaviours of our business:

- Make it safe for everyone
- Create the future
- Be the Customer choice
- Grow Stronger Together

We trust and support each other as a team and, to enable our customers to trust us, we're committed to always do the right thing and take appropriate steps to combat modern slavery throughout our businesses and in our supply chain.

Human Rights and Modern Slavery Policy

Our Human Rights and Modern Slavery Policy sets our commitment to respect human rights in line with international agreements.

Supplier Commitments

Our **Supplier Commitments** document communicates our operational expectations and requirements to suppliers in the areas of Environmental, Social & Governance (ESG). We commit to carrying out business operations in line with these standards and principles. Similarly we expect compliance from our suppliers and the adoption of fair and responsible behaviour.

If a supplier is found to be in breach of our commitments, we have an escalation process in place as part of our Human Rights and Modern Slavery Policy with the inclusion of a requirement to add to the Operational Risks and Issues Log for an immediate response from the Risk Action Group, and escalation to the Senior Leadership Team as the Risk Action Group determines is appropriate.

Whistleblowing Policy

Our **Call It Out! Whistleblower Policy** encourages genuine reporting of any misconduct or wrongdoing in the company and to protect those who disclose the misconduct or wrongdoings. Additionally, this policy outlines how colleagues can safely express their concerns, the protections available to them as Whistleblowers, and how the company will support them.

As we acknowledge that it may be uncomfortable to raise an incident in some situations, the company has appointed Safecall, an impartial third party provider to manage the process.

We take wrongdoing very seriously and we are committed to independently investigate any allegations raised. If our colleagues or suppliers see or suspect any wrongdoing, concerning modern slavery, health & safety, security, data protection or privacy, harassment, bullying or discrimination of others, bribery or corruption, dishonesty or fraud, or disregard of people's wellbeing we want them to tell us about it and call it out. This policy and service has been communicated to all employees and is included in our Supplier Manual for access by our external providers.

Risk Assessment

We have a large supply chain, so we take a risk-based approach to human rights and modern slavery.

We identify and mitigate sources of risk of all centrally controlled suppliers of products for resale and goods/service not for resale (GNFR) through Online Risk Assessment. We are using SEDEX and other sources for information to provide us with intelligence on countries of risk, as well as evaluating product, material and sourcing risk.

Products will not be sourced from any suppliers with critical failures such as the identification of slavery and human trafficking as detailed in our Supplier Commitments document.

There is a low risk of modern slavery occurring in our business operations and among our direct employees as we have strong employment policies and practices in place.

Due Diligence and Monitoring

Within our supply chain we have due diligence activities in place to monitor all centrally-controlled suppliers. These include contractual agreement to our Supplier Commitments documented standards, completion of our Online Risk Assessment and Ethical factory audits.

Our Online Risk Assessment reviews suppliers' policies and standards across Environmental, Social and Governance (ESG).

We require all factories that manufacture Highbourne Exclusive Brand products to have a third party ethical assessment in place, preferably a **SMETA** (Sedex Members Ethical Trade Audit) Assessment. It is our policy that these assessments should be carried out by accredited auditors certified by APSCA (Association of Professional Social Compliance Auditors). The results of this are assessed by our ethical auditing partner Verisio using the Highbourne Group Code of Conduct with resulting corrective actions communicated to the supplier. These assessments are on a non-announced or semi-announced basis and scheduled to take place every two years.

Where there is evidence of critical risks, these need to be addressed immediately to mitigate the risk and we will not continue trading with the supplier until they can demonstrate compliance. Depending on the nature of the issue, a member of our team or agent may visit the factory to help with the remediation plan. We engage with the factory throughout the process and work to ensure the wellbeing of workers is prioritised.

We start from a principle that we should work with our suppliers to help them address issues and improve performance. Factories agree to the implementation of a remediation action plan and we agree enough time for them to develop their knowledge and implement changes.

With reference to due diligence within our own business we operate a recruitment policy where we verify the identity of each colleague and their right to work. Our Whistleblowing Policy and Safecall service enable colleagues and suppliers to report any concerns, including about modern slavery and any other human rights violations, securely and without fear of recrimination.

In addition to direct recruitment, we utilise contractors and recruitment agencies that supply us with staff. To identify and mitigate risk, due diligence is undertaken when considering taking on new suppliers, and we regularly review existing suppliers.

Commitment

At Highbourne Group we continue to strive to eradicate any unethical business practice and inhumane treatment both within our own business and across the supply chain. We are committed to provide sufficient resources and systems to proactively protect everyone and operate responsible sourcing activities for purchase of both goods and services.

Performance

There were no incidents of Modern Slavery reported in our business or supply chain during 2024.

We have collated all of the supplier Online Risk Assessments and created a Dashboard to continually monitor performance. Progress on business improvements made by suppliers and mitigation of risk is reviewed on an ongoing basis.

We are committed to continue to be a GOLD member of Constructionline, a member of the Supply Chain Sustainability School and Ecovadis which is a prerequisite for assurance on ethical competence. We have also completed many supplier surveys for our contract customers on request to show our own levels of due diligence and mitigation with reference to modern slavery.

2024 Progress and Training Initiatives

The key initiatives undertaken and delivered during 2024 were:

- Joined SEDEX (Supplier Ethical Data Exchange) to enhance our ethical trading activities
- Continued to arrange ethical assessments across manufacturing sites that produced Highbourne Exclusive Products with verification checks carried out by an accredited third party using the Highbourne Group's Code of Ethics
- Continued to monitor our suppliers using the Online Risk Assessment which now includes the primary suppliers of Goods Not for Resale (GNFR) (currently excluding Plumbworld)
- Inclusion of responsible sourcing activities within our overarching ESG strategy
- Continued to enhance our Right to Work process to reinforce the message on ensuring required checks are carried out as part of our colleague recruitment process and have provided additional training and guidance
- Checked on all labour agency suppliers are a member of an industry body such as the REC (Recruitment and Employment Confederation), and align with our commitments to eradicate Modern Slavery
- Utilised our training platform to ensure all colleagues completed their MS compliance eLearning course, with communication and opportunities to refresh where needed. This course is mandatory for all colleagues within the business, with online data updated daily for management to review/check realtime
- Further induction training on the Modern Slavery Act took place for new starters within the commercial team, to educate and raise awareness of modern slavery indicators in the supply chain

Focus for 2025

2025

Our key focus areas for 2025 include:

- Publishing our first ESG roadmap with clear initiatives for future development
- Full utilisation of SEDEX for further enhancing our ability to map our supply chain for inherent risks and action accordingly
- Update and re-launch the Highbourne Supplier Online Risk Assessment (2 year cycle) to reflect our SEDEX membership and key areas of focus:
 - > Expand the scope to reflect differing types of suppliers
 - > Review the levels of risk and escalation process
 - > Assist suppliers to continually improve their performance
 - > External training for colleagues involved with carrying out ethical desktop assessments
- Working with our new Sourcing Agents for ensuring the Highbourne ethical requirements are upheld

Progress is being made for the integration of Plumbworld (acquired by Highbourne Group during 2022) with recognition of using Sedex for global sourcing activities

We are dedicated to tackling this serious issue and taking steps to combat modern slavery and human trafficking both within our own businesses and throughout our supply chain.

This statement relates to the financial period ending 31st December 2024 and was approved by the Board of Highbourne Group Limited in May 2025 on behalf of itself and its relevant subsidiaries and signed on its behalf by:



Dave Evans
CEO Highbourne Group