Modern Slavery Act Statement 2024/25

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 2023.

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 manufacturers 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 who 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 slavery or human trafficking issues, without fear of victimisation, subsequent discrimination, reprisal, disadvantage, or dismissal. Any incidents reported will by fully investigated and acted upon, if founded.
- The Corporate Social Responsibility Policy which sets out our fundamental values and represents a framework of our existing operating principles which outlines the basic standards of conduct we expect our employees and suppliers to adhere to. 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 understanding to deal only with those suppliers who share and uphold the same principles as James Halsted 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 have adhered to the highest standards of ethics that 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 recognise 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:

i. the internal and external audit process.
ii. the monitoring of Human Resource and payroll systems
iii. 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, made pursuant to section 54, part 6 of the UK Modern Slavery Act 2015, was approved by the Board on the 29th of November 2024 and has been signed by the Chair, on behalf of the Board of Directors.

Signed

Mark Halstead
Chairman
James Halsted plc