

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Havwoods Global Holdings Limited and on behalf of all trading subsidiaries for the financial year ending 31 December 2023. Havwoods is committed to acting responsibly in all our business practices through making sound decisions which take social, economic and environmental factors into account. We want to be part of a socially and environmentally responsible supply chain, sourcing and delivering worldwide and choosing business partners who share our company values and targets.

Organisation's Structure

Havwoods Limited is an importer and retailer of hardwood flooring. Havwoods ultimate parent company is Havwoods Global Holdings Limited. The UK Trading company is Havwoods Limited.

Havwoods Limited has an annual turnover in excess of £40 million. Whilst Havwoods Global Holdings Limited is the Group's holding company, the Directors consider it is best practice and demonstrates commitment to our obligations that this statement is prepared on behalf of Havwoods Global Holdings Limited and its trading subsidiaries ("**Group**").

The Group's head office is in Carnforth, Lancashire. The Group has around 150 employees with the majority based in England as well as Australia, US, Canada and the EU.

In addition to the main UK trading company, Havwoods Limited, the Group has other subsidiary and associated undertakings in the jurisdictions referred to above. Further, the Group has entered into distribution agreements allowing third party entities to distribute the Group's products in a number of other countries.

Supply Chains

At Havwoods International our values underpin everything we do. People matter, the well-being of our employees is crucially important to us and we continue to build long term business partnerships and long lasting relationships with our supply chain based on fundamental principles of our Responsible Purchasing Policy.

The Havwoods Responsible Purchasing Policy outlines the commitments we make and the processes we require from all our product suppliers to demonstrate compliance and good practices through the supply chain. Our suppliers are required to submit an annual independent audit to confirm manufacturing standards, compliance and good working practices are aligned to our responsible Purchasing Policy. Our Technical and Buying teams, or agents on our behalf, regularly visit the factories and require updates on worker engagement programmes, sustainability and reviews of any corrective action plans. These visits are prioritised according to our risk assessment program informed by the best available information, we choose to work with suppliers who demonstrate ethical practices above what would be considered the minimum and a full due diligence exercise takes place with new suppliers to ensure they satisfy our standards and values.



The Havwoods Responsible Purchasing Policy is based on the International Labour Organisation (ILO) standards. This includes the key principles:-

- Freedom of Employment
- The right to collective bargaining and freedom of association are respected
- Safe and hygienic working conditions
- Child labour is not acceptable
- All workers shall be paid a living wage
- Working hours are not excessive
- Discrimination shall not be practiced
- Regular Employment is provided
- No harsh or inhumane treatment is allowed

Non-UK based subsidiaries

Our non-UK based subsidiaries are required to comply with the Havwoods Responsible Purchasing Policy and our standards are rolled out across the Group, worldwide. Provision is also made to ensure compliance will local laws and regulations for the territories in which we are based. Further, our products are sourced from the same suppliers for all our subsidiaries and therefore the supply chain is audited centrally as set out above.

Our Group has a zero tolerance approach to modern slavery and human trafficking, which is reflected in our policies and controls on Ethical Trading throughout our product supply chain. With over 30 product suppliers based in 15 countries, some of whom we have been working with for more than 10 years, we have established strong business partnerships. We will continue to nurture these relationships and remain true to our values.

Policies on Slavery and Human Trafficking

Our Group expects all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and international partners to comply with our anti-slavery and human trafficking policy. We have in place a robust disciplinary procedure for dealing with any employee who fails to comply with our policy and values.

Our recruitment policies ensure employees establish their right to work in the UK, or relevant jurisdiction, and satisfy minimum age requirements and our internal human resources policies ensure working practices are monitored for ongoing compliance with current legislation.

Our whistleblowing policy provides internal contact points as well as access to an external reporting line to our employees, business partners and other third parties in order to report any whistleblowing concerns, including any Modern Slavery Act 2015 breaches or potential breaches.

We provide internal training on modern slavery and human trafficking, including supplier due diligence, to all relevant employees.

Due Diligence Processes

As part of our initiative to identify and mitigate risk we have carried out a risk assessment to identify and assess potential risk areas within our supply chain, as detailed above.

We have in place 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; and
- Protect whistle blowers.

Our Effectiveness in Combating Slavery and Human Trafficking

Our Group is in the process of evaluating the effectiveness of the measures we have in place to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. We are working on some tangible key performance indicators to assist us with measuring this effectiveness.

Future Steps

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:

- We will carry out refresher training for all relevant employees.
- We will agree some key performance indicators to help us measure our effectiveness in combatting modern slavery and human trafficking with our business and supply chains.
- We are in the process of updating our due diligence system to make improvements and take into account any changes.
- We will be rolling out our due diligence process to third party International Partners and ensuring any new Partners are audited in line with our due diligence system.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2023. It was approved by the board on 1 March 2024.



Andrew Barnes
Global Managing Director