



NORCROS

Norcros plc & Norcross Group (Holdings) Ltd - Modern Slavery Act Statement

Introduction

This statement contains a summary of the measures taken by Norcross to implement the requirements of the Modern Slavery Act 2015.

About Norcross

We are the UK and Ireland's number one bathroom products group, and the second largest in South Africa. We craft design-led, sustainable bathroom and kitchen products. But even more than that, our business is about people – our customers, our employees, our society and the way we live.

Norcros is a group of market-leading brands that design and supply sustainable bathroom and kitchen products in the UK, Ireland and South Africa in addition to selected export markets. We go to market through product-specialist brands. They each supply high-quality, design-led products aimed at the mid to premium end of the market. We stand out from the crowd because our in-house design teams create innovative and sustainable products, and we offer outstanding customer service. Our brands are strong individually, and even better together. We have an inclusive and growth-focused culture and foster a caring, collaborative and innovative environment in which our people can bring ideas to life, build long-lasting relationships and fulfil career and personal goals.

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Overarching Objective

Norcros is committed to the best corporate practices and ethical values. The Company aims to act with integrity to all stakeholders and undertakes its business in a lawful manner and takes reasonable measures to require the members of its supply chains to do the same.

*We do not accept and will not tolerate slavery and human trafficking,
both within Norcross and in its supply chains.*

Our Approach

We recognise that human rights issues (including modern slavery and human trafficking) are not limited to our own operations but can occur everywhere along the value chain. We will focus on our own operations, but we also believe all those involved - suppliers, customers, partners and other key



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stakeholders – should work together to develop practical risk-based solutions for a responsible and inclusive supply chain. Going forward, we will continue to review our operations and supply chain to manage potential modern slavery and human trafficking risks, and the following sections of this statement outline key steps taken during the past financial year.

Policies in Relation to Modern Slavery

Across the whole of the Norcross group we apply the following policies. These are made available to all our people, and training is given as appropriate.

Code of Ethics and Standards of Business Conduct

Norcross is committed to the best corporate practices and ethical values. We undertake our business in a lawful manner and take reasonable measures to require those parties we have business relationships with to do the same. At Norcross we pride ourselves on our reputation for acting fairly and ethically wherever we do business. The principles set out in this Code of Ethics and Standards of Business Conduct reflect our commitment to ethical business practices and provide guidance for Norcross employees and others doing business with us, such as our customers, suppliers and partners.

Whistleblowing policy

Norcross encourages an environment where honest and open communication is expected, with employees feeling comfortable bringing forward any concerns or violations of Group policies. This is embedded into the Code and Standard and legal protection exists for all whistleblowers. Norcross maintains a whistleblowing policy and engages two independent and confidential whistleblowing service providers, one covering South Africa specifically and the other covering all other locations. Both lines operate 24/7 and 365 days a year in the whistleblower's chosen local language. Concerns and reports can be made in confidence anonymously, and we will not discriminate or retaliate against any employee who reports suspected violations in good faith or who co-operates in any investigation or enquiry regarding possible violations.

In addition, if any employee has a grievance that relates to concerns over human rights, then all Norcross businesses have processes in place for the grievance to be raised with senior management and dealt with.

Supply Chain Policy

Norcross' Supply Chain Policy outlines our expectations of our suppliers in relation to environmental and social issues such as climate change, water consumption, human rights and health and safety, among others. We have established our Supply Chain Policy to drive continuous improvement and environmental and social standards across our supply chain. Our aim is that our suppliers, and importantly our Key Suppliers, work towards the same ambitions and goals as our ESG strategy.

Risk assessment and due diligence process

The integrity of our supply chain is a vital component to our business model and we recognise as one of our principal risks the loss of a key supplier. Norcross regularly assesses supplier-related risks and ensures that we have systems in place that enable our products to be responsibly sourced from suppliers whose values are aligned with our own.

Due to the diverse nature of the Group, our suppliers vary across the different brands, not only by type of supplier but also by global location. Our supply base ranges from China to South Africa and we have processes in place to ensure that regardless of the location our suppliers are aligned with Norcross'



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expectations. The Group regularly reviews the geographical concentration of its supplier base and mitigates risks arising where it is commercially and economically practical to do so.

Norcros' new Supply Chain Policy has established formal mechanisms for compliance with our Safety, Environmental, and Human Rights policies by our suppliers. The policy, in tandem with our Supplier Assessment Form, will allow us to monitor suppliers' performance on a regular basis. Where a supplier does not currently adequately meet the standards set out in this policy, we will ask the supplier to put in place reasonable improvement plans.

In addition to the measures outlined in our Group Supply Chain Policy and Supplier Assessment Form, our brands also take individual measures relating to Modern Slavery due diligence. Several of our brands require suppliers to carry out annual BSCI audits in addition to SMETA and SEDEX audits.

We plan to continue our discussions around the development of internal and external KPIs associated with our supply chain in the rest of 2024.

Key performance indicators to measure effectiveness of steps being taken

The Group measures the performance of our Modern Slavery requirements through the following indicators. Indicators 3-5 are measured annually as part of the Group's ESG Management and Information Framework.

1. All employees receive training on the Modern Slavery Act requirements.
2. Conformance rate with Norcross Code of Ethics and Standards of Business Conduct
3. Total number of reported breaches of Code of Ethics and Standards of Business Conduct in total.
4. Total number of investigated breaches of Code of Ethics and Standards of Business Conduct in total.
5. Total number of upheld breaches of Code of Ethics and Standards of Business Conduct in total.

Training on modern slavery and trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to all employees concerning the Modern Slavery Act requirements. Course completion rates are regularly monitored by the Norcross plc Audit and Risk Committee.

Actions Taken

During the year 1 April 2023 – 31 March 2024 the Company has taken the following key steps to meet the requirements of the Act:-

- Continued with the implementation of our Group Code of Ethics & Standards of Business Conduct, which reinforced our commitment to not accepting or tolerating the use of child labour or forced labour (i.e. Modern Slavery) anywhere in our own business or our direct supply chain
- Continuing reinforcement of other existing policies covering ethical business practices and legal compliance
- Ongoing management of labour and human rights issues within our own operations to



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ensure that we manage our businesses in a manner that will support us in mitigating and combating potential modern slavery and human trafficking risks and concerns

- We have published our first Supply Chain Policy and Supplier Assessment Form which set out our expectations of suppliers in relation to environmental and social issues.
- As part of our ESG agenda continuing to map our supply chain to identify risks relating to modern slavery and human trafficking using a credible global framework. In this regard, we continue to make progress on enhancing our supply chain practices. We have historically strong and long serving partners who are working with us as we continue to develop our ESG strategy and related policies
- The ongoing consideration of ethical risk in business specific risk registers, business self-assessments and annual management declarations
- Continuing implementation of processes to confirm with key supply chain partners their commitment to the eradication of slavery and human trafficking
- Continued monitoring and promotion of whistleblowing arrangements, to facilitate the raising of any concerns
- Introduction of mandatory online awareness training concerning Modern Slavery Act requirements for all employees. Course completion rates are regularly monitored by the Norcross plc Audit and Risk Committee to ensure they remain at an acceptable level.

Actions to be Taken

We will continue with implementing the general approach and specific measures stated above. Key steps to be taken will include:

- Continuing development of our ESG strategy and related policies
- Developing further KPIs to monitor supplier conformance with our Supply Chain Policy
- Progress further with awareness of, and training about, modern slavery and trafficking
- Develop checking of labour suppliers further

Approved by the Company

Approved by Norcross plc and Norcross Group (Holdings) Limited on 12 June 2024

Thomas Willcocks
Chief Executive Officer