



NORCROS

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

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Norcross plc and Norcross Group (Holdings) Limited, together with the wider Norcross Group, to prevent modern slavery and human trafficking in their business and supply chains during the financial year ended 31 March 2026.

About Norcross

Norcros is a group of market-leading brands that design and supply sustainable bathroom and kitchen products in Europe and South Africa, in addition to selected export markets. It comprises seven operating businesses in the UK and Europe and three in South Africa. 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.

The Group's brands are supported by in-house design expertise, strong customer relationships and a focus on innovation, sustainability and service. At Norcross, we trust our people to lead with care, act with courage, build connections and use their common sense – building an inclusive, growth-focused culture where everyone can **#BeSomeone**.

Further information about the Group is available at www.norcros.com.

The Norcross Keys (values)

At Norcross, we live our purpose by starting from a place of doing good, bravely challenging the status quo, and working together with a disciplined, collective focus. Our Keys are the foundations of how we work at Norcross. They guide the decisions we make, the way we collaborate, and the culture we are building across the Group.

Together, they add up to #Be Someone: a commitment to valuing every individual and creating an inclusive, growth-focused environment where everyone can thrive, contribute and make a positive difference. Our Keys are:

1. Care
2. Courage
3. Connection
4. Common Sense

Overarching objective

Norcros is committed to high standards of corporate governance, ethical conduct and legal compliance. The Company aims to act with integrity towards all stakeholders, conducts its business lawfully and takes reasonable steps to require those within 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

Norcros recognises that human rights risks, including modern slavery and human trafficking, can arise both within its own operations and throughout the wider value chain. The Group therefore focuses on managing risks within its own business while also engaging with suppliers, customers, partners and other stakeholders to promote responsible and inclusive supply chains.

During the year, the Group continued to develop supplier engagement mechanisms, while individual brands took steps to increase visibility across their supply chains. Suppliers were engaged through reviews, performance evaluations, visits and external social audits, where appropriate, to assess whether Norcross' values ("Keys") and expectations were being upheld. The following sections summarise the key measures taken during the financial year.

Policies in relation to modern slavery

Across the Norcross Group, the following policies support the Group's approach to preventing modern slavery and human trafficking. These policies are made available to employees, with training provided as appropriate. Supplier assessments also include consideration of human rights policies and practices, and suppliers are encouraged to cascade equivalent standards through their own supply chains.

Code of Ethics and Standards of Business Conduct

The Code of Ethics and Standards of Business Conduct reflects Norcross' commitment to ethical business practices and provides guidance for employees and others doing business with the Group, including customers, suppliers and partners. It reinforces the expectation that business should be conducted lawfully, fairly and ethically, wherever the Group operates.

Whistleblowing Policy

Norcros 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 Standards 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 services 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.

In FY26 Norcross received eight whistleblowing reports. All reports were investigated and appropriate actions were implemented as advised by management. A summary of whistleblowing activity is shared at every Audit and Risk Committee meeting, including trends, investigations and outcomes. At least once a year, the Committee reviews the Group's overall approach to whistleblowing to ensure it remains effective and fit for purpose.

Supply Chain Policy

Norcros' Supply Chain Policy sets out the Group's expectations of suppliers in relation to environmental and social matters, including climate change, water consumption, human rights, health and safety, and related issues. Norcross does not tolerate child labour, forced labour or modern slavery in its own



operations or supply chains. The policy is intended to support continuous improvement in environmental and social standards across the Group's supply chain, particularly among key suppliers.

Risk assessment and due diligence process

The integrity of the Group's supply chain is an important component of Norcross' business model. The Group regularly assesses supplier-related risks and seeks to ensure that it has systems in place to source products responsibly from suppliers whose standards and values are aligned with its own.

Given the diversity of the Group, suppliers vary by brand, category and location. The Group's supply base includes suppliers in a number of jurisdictions, including China and South Africa. Norcross reviews the geographical concentration of its supplier base and seeks to mitigate associated risks where it is commercially and economically practicable to do so.

The Norcross Supply Chain Policy establishes formal mechanisms for supplier compliance with the Group's safety, environmental and human rights expectations. Together with the Supplier Assessment Form, it enables Norcross to monitor supplier performance on a regular basis. Where a supplier does not adequately meet the standards set out in the policy, Norcross expects the supplier to put in place reasonable improvement plans and to demonstrate progress against them.

In addition to Group-level controls, individual brands undertake due diligence measures relevant to their supplier base and risk profile. Several brands require suppliers to complete annual BSCI audits or SMETA/SEDEX audits, where appropriate.

The Group will continue to develop internal and external KPIs to monitor supply chain performance, supplier conformance and the effectiveness of its approach to managing modern slavery and human trafficking risks.

Key performance indicators to measure effectiveness of steps being taken

The Group monitors the effectiveness of its modern slavery and human trafficking controls through a combination of training, policy conformance, whistleblowing and supplier-related indicators. Indicators 3 to 5 are measured annually as part of the Group's ESG Management and Information Framework.

1. Completion of modern slavery awareness training by employees.
2. Conformance with the Norcross Code of Ethics and Standards of Business Conduct.
3. Total number of reported breaches of the Code of Ethics and Standards of Business Conduct.
4. Total number of investigated breaches of the Code of Ethics and Standards of Business Conduct.
5. Total number of upheld breaches of the Code of Ethics and Standards of Business Conduct.

Training on modern slavery and trafficking

To support understanding of the risks of modern slavery and human trafficking in the Group's business and supply chains, Norcross provides modern slavery awareness training to employees. Course completion rates are monitored regularly by the Norcross plc Audit and Risk Committee.



NORCROS

Actions taken

During the financial year from 31 March 2025 to 5 April 2026, the Company took the following key steps to meet the requirements of the Act:

- Continued implementation of the Group Code of Ethics and Standards of Business Conduct, reinforcing Norcros' commitment not to accept or tolerate child labour, forced labour or modern slavery in its own business or direct supply chain.
- Continued reinforcement of policies covering ethical business practices, legal compliance and responsible conduct.
- Ongoing management of labour and human rights matters within the Group's own operations to support the mitigation of modern slavery and human trafficking risks.
- Following publication of the Group Supply Chain Policy and Supplier Assessment Form, completed an internal audit review of the implementation process and supplier responses, with findings used to identify and implement practical improvements where required.
- Continued supply chain mapping as part of the Group's ESG agenda to identify modern slavery and human trafficking risks, using a recognised global risk framework where appropriate. Norcros also continued to work with established supply chain partners as its ESG strategy and related policies develop.
- Continued consideration of ethical risk in business-specific risk registers, business self-assessments and annual management declarations.
- Continued engagement with key supply chain partners to confirm their commitment to the eradication of slavery and human trafficking.
- Continued monitoring and promotion of whistleblowing arrangements to support the confidential raising of concerns.
- Continued mandatory online awareness training on Modern Slavery Act requirements for employees, with completion rates monitored by the Norcros plc Audit and Risk Committee.

Actions to be taken

Norcros will continue to implement and develop the measures described above. Key planned steps include:

- Continuing to develop the Group's ESG strategy and related policies, including those relevant to supply chain responsibility and human rights.
- Continue to monitor supplier conformance with the Supply Chain Policy and the effectiveness of related due diligence activities.
- Continuing to promote awareness of modern slavery and human trafficking risks through training and internal communications.
- Further developing checks relating to labour suppliers and other higher-risk areas of the supply chain.

Approved by the Company

This statement was approved by the boards of Norcros plc and Norcros Group (Holdings) Limited on 10 June 2026.

Thomas Willcocks
Chief Executive Officer