



Modern Slavery Act

Transparency Statement 2025

Published 2026



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 2025 and 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 have a responsibility to ensure that we act with integrity and behave ethically in everything we do at 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 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 & heating merchants and comprises of 3 divisions:

- **Digital:** Plumbworld, PlumbNation, The Underfloor Heating Store, National Shower Spares and DHS
- **Branch Network:** City Plumbing, PTS, Bathroom Showrooms and associated activities
- **Industrial & Wholesale:** Industrial P&H, Heating, Ventilation and Air Conditioning (HVAC) and wholesale

We are a major supplier for new build, social housing, repairs and maintenance markets, both in residential and commercial sectors. Our team of over 3,000 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 10,000 exclusive brand products sourced from more than 150 manufacturing sites across the world with about 20% classed as Direct Sourced.

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's 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.

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 provided an impartial third-party provider, Safecall, to manage concerns raised under this policy.

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). It categorises suppliers as Gold, Silver, Bronze or High Risk.

We require all factories that manufacture Highbourne Exclusive brands 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 2 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 worker and their Right to Work.

Our Right to Work procedure ensures required checks are carried out as part of our colleague recruitment process with appropriate training and guidance in place.

Checks are carried out on all labour agency suppliers are a member of an industry body such as the REC (Recruitment and Employment Confederation), and are aligned with our commitments to eradicate Modern Slavery.

Our Whistleblowing Policy and Safecall enable staff and suppliers to report any concerns, including about modern slavery and any other human rights violations, securely and without fear of recrimination.

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 have been no incidents of Modern Slavery reported in our business or supply chain during 2025.

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 continue to also complete many supplier surveys for our contract customers on request to show our own levels of due diligence and mitigation with reference to modern slavery.

2025 Progress and Training Initiatives

The key initiatives undertaken and delivered during 2025 were:

- We have continued to use SEDEX (Supplier Ethical Data Exchange) to enhance our ethical trading activities
- Refreshed our Online Risk Assessment process to take into account the increasing use of SEDEX
- Used the ESG Steering Group to review performance against our goals:
 - Published our first ESG Roadmap and brochure
 - Scheduled regular meetings attended by key stakeholders
 - Reviewed colleague training modules including the e-module for Modern Slavery Act compliance
- Good progress has been made by Plumbworld with ethical audits now in place across all high risk suppliers

Focus for 2026

Our key focus areas for 2026 include:

- Enhanced factory audit process with a verification audit carried out by Verisio on a risk basis for factories that manufacture Highbourne Group Exclusive brands
- Continue to work with Plumbworld for alignment of responsible Sourcing activities including the Online Risk Assessment process
- Increasing the level of factory visits carried out by Highbourne Group colleagues with an agenda inclusion of ethical trading
- Revised Risk Committee meeting format with inclusion of any identified ESG risks
- Review content of e-learning training course which will continue to be a mandatory requirement for all new starters

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 2025 and was approved by the Board of Highbourne Group Limited in April 2026 on behalf of itself and its relevant subsidiaries and signed on its behalf by:



Earl Sibley
Chief Financial Officer
Highbourne Group