

## **Anti-Slavery and Human Trafficking Statement**

Bathroom Brands Limited (the 'Company') and its subsidiaries (together the 'Group') are committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. The UK subsidiaries covered by the group statement are listed in appendix 1.

We are committed to preventing slavery, human trafficking, forced and child labour in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We are therefore committed to addressing the requirements of the UK Modern Slavery Act 2015 and ensuring that our supply chain is compliant with the regulations prescribed therein.

We intend to govern all current and future third party relationships with these slavery issues in mind. We will not knowingly support and/or do business with any suppliers who are involved in slavery.

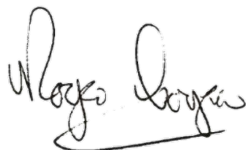
Due diligence procedures are being introduced to assess the nature and extent of our exposure to the risk of slavery. In order to fulfil our obligations under the Act, the Group will:

- request information regarding third party supplier's working practices and require the relevant supplier to confirm that it is aware of, and complies with, its obligations under the Act;
- communicate to potential new suppliers that we have a zero tolerance policy with regards to slavery;
- include reference to, and compliance with, these slavery supply chain issues in our supplier engagement process, supplier audit procedures and contractual arrangements with third party suppliers.
- identify and assess particular product or geographical risks of modern slavery and human trafficking, including through the completion of our 'Supplier Code of Conduct Declaration'.
- Terminating our relationship with suppliers that violate our Supplier Code of Conduct.

We have instituted online training to provide an understanding of slavery and our obligations under the Act to all key employees, including Board members and Executive officers.

This statement, which will be reviewed annually and updated as required, has been approved by our Board of Directors and is made pursuant to section 54 of the Act and constitutes the Group's modern slavery and human trafficking statement, as required by the Act, for our financial year ending 31 December 2020.

**Signed:**



**Chairman  
Bathroom Brands Limited**

**Date:** 23 September 2020

## **Anti-Slavery and Human Trafficking Policy**

### ***Introduction***

Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act").

This document sets out Bathroom Brands Limited (the 'Company' and together with its subsidiaries, the 'Group') policy, with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

The Group is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas.

We are committed to preventing slavery, human trafficking, forced and child labour in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

### ***Detecting and preventing Modern Slavery***

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

- request information regarding third party supplier's working practices and require the relevant supplier to confirm that it is aware of, and complies with, its obligations under the Act;
- communicate to potential new suppliers that we have a zero tolerance policy with regards to slavery;
- include reference to, and compliance with, these slavery supply chain issues in our supplier engagement process, supplier audit procedures and contractual arrangements with third party suppliers.
- identify and assess particular product or geographical risks of modern slavery and human trafficking, including through the completion of our 'Supplier Code of Conduct Declaration'.

- Terminating our relationship with suppliers that violate our Supplier Code of Conduct.

### ***Identifying and reporting modern slavery***

All employees are encouraged, including through our Whistleblowing Policy, to raise any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature, including suspected modern slavery associated with the Group or our suppliers. In addition, staff are encouraged to report any suspected incidences through our secure online compliance reporting service (EthicsPoint) anonymously or otherwise.

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Group will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

### ***Breaches of policy***

If an issue is identified with a supplier, we will work with them to understand their breach and prepare a corrective action plan and resolve all violations within an agreed upon time period.

We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy and/or fail to meet the requirements of a corrective action plan

### ***Responsibility, communication and awareness of this policy***

Ultimate responsibility for this policy rests with the Group's leadership. The Board has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.



Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### ***Training***

The Group has established an on-line training programme, including a module concerning Modern Slavery which is mandatory for Board members, all Executive officers and identified key employees working in supply chain management and relevant roles. This includes learning how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

Awareness training is provided for all main board members and entity directors and any other staff in relevant and appropriate roles.

### ***Review***

This policy will be reviewed by the Group's Board of Directors on a regular basis (at least annually) and may be amended from time to time. This policy will be used to inform our Statement on Slavery and Human Trafficking which will be published annually.

Date: 23 September 2020



## **Appendix 1 – UK entities covered by this group policy**

Bathroom Brands Limited

Bathroom Brands Group Limited

Bathroom Brands Holdings UK Limited

Crosswater Holdings Limited

Crosswater Limited