

## MODERN SLAVERY ACT STATEMENT

### Commitment to Tackling Forced Labour, Modern Slavery, Human Trafficking and Child Labour

Grant Westfield is committed to ensuring that there is no forced labour, modern slavery, human trafficking or child labour in any part of our business or supply chains. We recognise the economic and social aspects of the manufacture, sale and distribution of our products. We ensure that our business dealings are conducive to good labour practices within both our own organisation and our supply chain. Grant Westfield complies with UK labour laws which prohibit child labour, forced labour and coercion. We ensure that our employment relationships are voluntary and based on mutual consent, without the threat of penalty or exploitation. Furthermore, we take care to procure goods and services in a way that does not threaten human well-being, the rights of children, poverty alleviation and sustainable livelihoods. We acknowledge that forced labour, child labour, slavery and human trafficking remain a global problem and accept our responsibility for due diligence over our supply chains.

Grant Westfield complies with relevant legislation and shall apply in all its operations and facilities the FSC Core Labour Requirements.

Grant Westfield shall

- Not use child labour
- eliminate all forms of forced and compulsory labour
- ensure that there is no discrimination in employment and occupation
- respect freedom of association and the effective right to collective bargaining

We shall apply due diligence as far as is reasonably practicable to avoid direct or indirect involvement with companies at risk of violating the ILO Core Conventions, or which employ practices indicative of forced or compulsory labour, including, but not limited to, the following:

- physical and sexual violence;
- bonded labour;
- withholding of wages /including payment of employment fees and or payment of deposit to commence employment;
- restriction of mobility/movement;
- retention of passport and identity documents;
- threats of denunciation to the authorities.

Grant Westfield also applies due diligence as far as is reasonably practicable to avoid direct or indirect involvement with companies which employ child labour including, but not limited to, the following:

- Employing workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher.
- Employment which interferes with schooling or is otherwise harmful to the health or development of children.
- Where persons under the age of 18 are employed in hazardous or heavy work (except for the purpose of training within approved national laws and regulations).

### About Grant Westfield

Grant Westfield is wholly owned by Norcros Group (Holdings) Limited. Our manufacturing facility and headquarters is located in Edinburgh, where most of our staff are employed. We also employ sales and logistics staff throughout the UK.

Grant Westfield is the leading UK supplier of water-proof wall, ceiling and floor panels. Our Multipanel® range of laminated wall panels are made from high quality materials which we source globally. Our ranges of PVC and compact laminate wall panels and vinyl flooring are procured through an international supply chain. Our products are distributed for sale throughout the UK and internationally using both our own employees and external logistics companies.

### Organisational Responsibilities

The directors at Grant Westfield are responsible for leading a culture of excellence in employment and procurement ethics. Senior managers ensure that relevant staff are aware of, and accountable for mitigating the risks of child labour, forced labour, slavery and human trafficking. Anyone who has a concern about practices in our operations and supply chains shall report this to the company directors or via our Group's confidential whistleblowing line.

## Due Diligence

Grant Westfield has undertaken due diligence to verify the absence of child labour, forced labour, slavery, and human trafficking in our supply chains, including the following:

- Identified and assessed vulnerability and risk within our supply chains and established control measures to mitigate any such risks.
- Internally assessed the supply chain risks as part of our supplier qualification process prior to entering into any trading agreement.
- Required that our point of contact for complex or international suppliers is a UK company or branch and expecting these entities to have suitable anti-slavery and human trafficking policies and processes. We also expect each entity to conduct due diligence on the next link in the chain.
- Taken appropriate checks to ensure that international suppliers comply with International Law on slavery and child labour, including inspection by senior members of management.
- Favouring relationships with organisations that have achieved third party certification of compliance with all applicable laws.
- Visits to companies supplying our materials.

## Our Effectiveness in Combatting Slavery and Human Trafficking

We have established the following metrics to establish how effective we have been in ensuring that forced labour, slavery and human trafficking is not taking place in any part of our business or supply chains:

- Targets for completion of supplier assessments.
- Register of Tier 1 suppliers recording those with third party certificates of compliance.
- Targets for assessment visits to international suppliers with whom we have direct dealings.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, training has been provided to relevant members of the Grant Westfield team.

## Legal Context

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 with respect to our financial year ending on 31 March 2023 and how we meet our Transparency in Supply Chains obligations.

**This policy will be reviewed annually and revised as required.**

Signed:



Date: 30 May 2023

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Sarah Law – Managing Director