

## Lords Group Trading Limited and subsidiaries

### Modern Slavery Act 2015 – Slavery & Human Trafficking Statement

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Lords Group Trading Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2021.

### Our business and supply chains

- **Lords Group Trading Limited and all subsidiaries**
- **Suppliers of Plumbing, Building, Timber & Civils materials, Retailers of Housewares and sheet metal fabricators**
- **Operating across the UK**

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

*We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.*

### Risk assessment

In the past year, we conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.



## Policies

Lords Group Trading Limited Ltd operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Whistleblowing Policy** - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Purchasing Code** - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.

## Supplier due diligence

Lords Group Trading Limited and its subsidiaries conduct due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements
- In January 2020 an inspection was made to the mines in Kota, Rajasthan, India by CEO Shanker Patel. A checklist risk assessment was carried out with no evidence of slavery or forced labour found during the visit.
- Further visits in 2020 were planned to China and to Brazil for inspection of suppliers factories or mills, however, these were cancelled due to the Covid-19 crisis.

### We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment



## Supplier Code of Conduct

Lords Group Trading Limited have issued suppliers our Supplier Code of Conduct. This Code formalises Lords Group Trading Limited practices and makes clear that, recognising differences in cultures and legal requirements, we expect that wherever our suppliers are located, producing products for us or delivering services for us, that they are produced and/or provided in a manner compatible with the high standards that contribute to the reputation of Lords Group Trading Limited.

Suppliers are required to comply with this Code and to have and maintain practices like those in the Lords Group Trading Limited Code of Conduct. Lords Group Trading Limited are committed to helping its suppliers comply with these standards. In turn, Lords Group Trading Limited expects its suppliers to apply these standards to the suppliers they work with in providing goods and services to the company. Lords Group Trading Limited strongly encourages suppliers to exceed the requirements of this Code and promote best practices and continuous improvement throughout their operations.

## Awareness & Training

Lords Group Trading Limited has raised awareness of modern slavery issues by putting up posters across our facilities and sending an email that is focused specifically on modern slavery to all our colleagues, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

This statement covers 1<sup>st</sup> January 2020 to 31<sup>st</sup> December 2021 and has been approved by the board of Lords Group Trading Limited.



Chief Executive Officer