



HUMAN RIGHTS POLICY

WHY HUMAN RIGHTS MATTER TO US

Howdens was founded on the principle that the business should be worthwhile for all concerned, which includes being worthwhile for our trade customers, our staff, end-users of our products, our local communities, our suppliers, and our investors (**Key Stakeholders**). This founding principle has shaped our business model and our strategic decisions since Howdens opened its first depots in 1995, and it continues to be at the heart of what we do.

We know that our operations, and those of our global supply chain, could have impacts, good or bad, on human rights. Howden Joinery Group Plc and all of its subsidiaries and affiliates (**Howdens** or the **Company**) are committed to supporting and respecting the protection of internationally proclaimed human rights (**Human Rights**) wherever possible. A list of the Human Rights that we recognise as likely to be the most salient to our operations may be found in Appendix 1.

We also seek to ensure we are not complicit in Human Rights abuses by any other person, organisation, or government with whom we are affiliated. We regularly review the Human Rights risks associated with the Company, particularly within our supply chain where our most significant Human Rights risks are located. A list of the Human Rights that we believe are likely to be the most salient to our supply chain may be found in Appendix 1.

This Policy defines the basic standards of Human Rights that Howdens seeks to respect, and which it expects its workforce and business partners to respect.

SCOPE OF THE POLICY

This Human Rights Policy applies to all our operational locations (those being the UK, France, Belgium, the Republic of Ireland, the Isle of Man, Jersey, and Guernsey) (**Operational Locations**), and to all officers, directors, employees, and anyone working for us in the course of their employment (**Staff**).

We also expect all contractors, suppliers, agents, consultants, and other business partners (**Suppliers**) to join us in our commitment to respect Human Rights. Wherever possible, we will seek to include contractual obligations in our supply agreements in which Suppliers must agree to comply with this Policy and allow us to terminate our engagement, where appropriate, if they breach relevant laws and/or act in a way that is contrary to the principles of this Policy.

OUR POLICY

Howdens takes a zero-tolerance approach to Human Rights violations, and it is our policy to support and respect the protection of Human Rights wherever possible. We also expect our Staff and Suppliers to conduct their activities with a level of integrity which reflects our own values and principles and to comply with the Human Rights understood, at a minimum, from time to time in force, as those expressed in:

- the International Bill of Human Rights; and
- the principles concerning fundamental rights set out in the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.

Howdens is also committed to respecting human rights and labour standards set out as part of the Ten Principles of the United Nations Global Compact. Below, we have set out how we meet each of the principles that deal with human rights and/or labour standards and how we expect our Suppliers to do so too:

Support and respect the protection of internationally proclaimed human rights (Principle 1) and make sure the business is not complicit in human rights abuses (Principle 2)

We understand that Howdens has a 'social license to operate', and we therefore have a baseline responsibility to operate in a way that respects the protection of Human Rights. By operating in this way, we can maintain and strengthen the relationships we have with our Key Stakeholders.

We have put this policy in place to ensure that it is abundantly clear that we will always seek to ensure we do not commit, and are not complicit in, human rights abuses against any person or group, including, but not limited to, vulnerable groups such as women, children, people with disabilities, indigenous peoples, migrant workers, and older persons.

Whilst Howdens undertakes a significant amount of manufacturing in-house, we also have a global network of Suppliers. It is important to us that not only do we take steps to ensure that Human Rights are respected, but that our Suppliers do too. We recognise that our supply chain presents the highest risk in terms of human rights infringements given its global nature and we therefore mandate that our tier 1 Suppliers partner with the Supplier Ethical Data Exchange (SEDEX) in order to supply to us.

In addition, as part of our supply contracts, new Suppliers must sign up to our Supplier Code of Conduct, which establishes minimum ethical standards that must be met, and which must be auditable, by our Suppliers and by their own suppliers. The Supplier Code of Conduct is in addition to this Policy.

Uphold the freedom of association and the effective recognition of the right to collective bargaining (Principle 3)

Howdens recognises that its Staff have the right to form trade unions or other comparable, legal organisations of their own choosing, and to collectively make representations to, or enter into, negotiations over employment issues with us as their employer.

Ensure the elimination of all forms of forced and compulsory labour (Principle 4) and the effective abolition of child labour (Principle 5)

Howdens have a zero-tolerance approach towards human trafficking and all forms of forced or compulsory labour. We will seek to ensure that there is no forced, bonded, indentured, or involuntary prison labour in our operations and supply chains.

We are also committed to ensuring that working hours are reasonable and comply with the law in our Operational Locations, and that all work performed by our Staff will be on the basis of a recognised employment relationship established through national law and recognised practice. Staff will be provided with clear written information on their pay and other terms and conditions as required by local law in that jurisdiction.

Howdens will not, under any circumstances, use child labour in its own workforce, and we are committed to complying with all relevant laws in this regard.

Ensure the elimination of discrimination in respect of employment and occupation (Principle 6)

Howdens is an equal opportunities employer and is fully committed to eliminating discrimination in compensating, training, advancing, promoting, terminating, retiring, or employing people based on race, caste, colour, national origin, gender, gender identity, sexual orientation, religion, age, marital or pregnancy status, disability, union membership, political affiliation, or any other characteristic other than the worker's ability to perform the job (subject to any accommodations required or permitted by law).

Howdens also expects its Suppliers to uphold these values and therefore they also form part of our Supplier Code of Conduct.

POLICY IMPLEMENTATION

Where national laws in our Operational Locations differ from Human Rights standards or our own policies and procedures, we will, so far as possible, follow the higher standard. Whilst we believe the risk of this occurring within our Operational Locations is very low, if it is not possible to respect Human Rights fully in a particular context, we will respect them to the greatest extent possible in the circumstances.

Where the national laws of our Suppliers differ from Human Rights standards, we expect our Suppliers to, as far as possible, follow the higher standard. Where it is not possible for our Suppliers to respect Human Rights fully in a particular context, we expect our Suppliers to respect them to the greatest extent possible in the circumstances. If a Supplier were to breach relevant laws and/or act in a way that is contrary to the principles of this Policy, wherever possible contractually, and if appropriate to do so, the Company will seek to terminate our engagement with that Supplier.

The Board of Directors of the Company has overall responsibility for ensuring that this Policy is implemented.

TRAINING AND COMMUNICATIONS

This Policy will be supported by training for relevant Staff members. These Staff members will receive appropriate and regular training in Human Rights issues in the context of their role with Howdens, including as part of their training during their induction into the business.

This Policy will be made publicly available on the Howden Joinery Group Plc corporate website (www.howdenjoinerygroupplc.com) and will be communicated directly to relevant third parties.

MONITORING AND REVIEW

This Policy will be reviewed and, if necessary, updated on a regular basis by the Board of Directors of Howden Joinery Group Plc.

In line with our Supplier Code of Conduct, we will perform periodic monitoring of higher risk supply chain areas, which may include regular SEDEX Members Ethical Trade Audits (SMETAs), site visits, or requests for information.

Should anyone wish to disclose to Howdens any concerns about actual or potential Human Rights infringements by its Suppliers or Staff, they are encouraged to report their concerns through the Whistleblowing facility, which is administered by a third party in a number of languages and can be used 24 hours a day, seven days a week, all year round, completely confidentially. The current provider of the Howdens whistleblowing facility is Navex, and they can be contacted on the numbers below. In line with

our Whistleblowing Policy, Howdens will not tolerate the harassment, penalisation, or victimisation of anyone raising a genuine concern.

Helpline: +44 (0)8081 965 845

If you are calling from the countries below, you may also use these helpline numbers:

France or Belgium: 0 805 98 78 58

Republic of Ireland: 1 800 851 819

The following dedicated website may also be used to raise concerns: www.howdens.ethicspoint.com

The Howdens Whistleblowing facility is not an emergency service and should not be used to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If urgent assistance is required, emergency services or local authorities should be contacted.

Staff members who wish to raise any concerns regarding Human Rights can also contact their Line Manager or the Human Resources team at an early stage. However, where this is not possible, or if the member of staff has concerns about confidentiality, they should raise their concerns via the Whistleblowing facility.

The Board of Directors and the Executive Committee of Howden Joinery Group Plc receive and review whistleblowing reports on a regular basis.

ASSOCIATED POLICIES, STATEMENTS, AND CODES

- Supplier Code of Conduct
- Modern Slavery Statement
- Whistleblowing Policy

APPROVAL OF POLICY

Approved by the Board of Directors of Howden Joinery Group Plc on 2 November 2023.

APPENDIX 1

The Human Rights that we recognise as likely to be the most salient to Howdens' operations are as follows:

- Right to just and favourable conditions at work¹
- Right to health¹
- Right to a safe and healthy working environment³
- Freedom from discrimination^{2,3}
- Right to equality between men and women^{1,2}

The Human Rights we believe are most salient to our global Suppliers are as follows:

- Freedom from slavery^{2,3}
- Freedom of children from social and economic exploitation^{1,3}
- Freedom of association^{2,3}
- Right to just and favourable conditions at work²
- Right to health¹
- Right to a safe and healthy working environment³
- Right to form trade unions¹
- Right to strike¹
- Minority rights²
- Right to equality between men and women^{1,2}
- Right of mothers to special protection before and after birth¹
- Right to privacy²

1 Derived from the International Covenant on Economic Social and Cultural Rights (ICESCR)

2 Derived from the International Covenant on Civil and Political Rights (ICCPR)

3 Derived from the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILO Declaration)