

Modern Slavery Statement

Howden Joinery Group Plc, a company incorporated and listed in the UK, is the ultimate parent company of the Howdens group of companies (altogether, 'Howdens' or the 'Howdens Group').

The following statement is intended to fulfil the legal requirement for a slavery and human trafficking statement to be produced for certain entities within the Howdens Group¹ and to demonstrate our commitment on behalf of all companies within Howdens.

¹ Howden Joinery Group Plc, Howden Joinery Ltd, Howden Joinery Corporate Services Ltd, Howden Joinery People Services, Howden Joinery Properties Ltd, Howden Kitchens Properties Ltd, Howden Joinery Holdings Ltd.



Organisational Structure

Who Howdens is and what it does

Howdens is the UK's leading specialist kitchen supplier, selling only through trade customers. The Group manufactures and sells kitchen and joinery products (through Howden Joinery Limited, a company incorporated in the England and Wales) through a network of nearly 900 UK depots. Howdens also has small trading operations in France, Republic of Ireland, Belgium, Isle of Man, Jersey and Guernsey. Collectively, these are our 'Operational Locations'.

Howdens manufacture all the cabinets for our kitchen ranges (almost 5 million a year) and some of the other kitchen and joinery products we sell from our factories in Yorkshire and Cheshire. The Group also buys-in thousands of different products from hundreds of suppliers around the world, including appliances, joinery, flooring and hardware ensuring that our depots can offer everything necessary to complete any kitchen. We keep under review what we believe is best to make or best to buy, balancing cost and overall supply chain availability, resilience, and flexibility. Products are distributed to depots either direct from the manufacturing site or by one of our distribution centres.

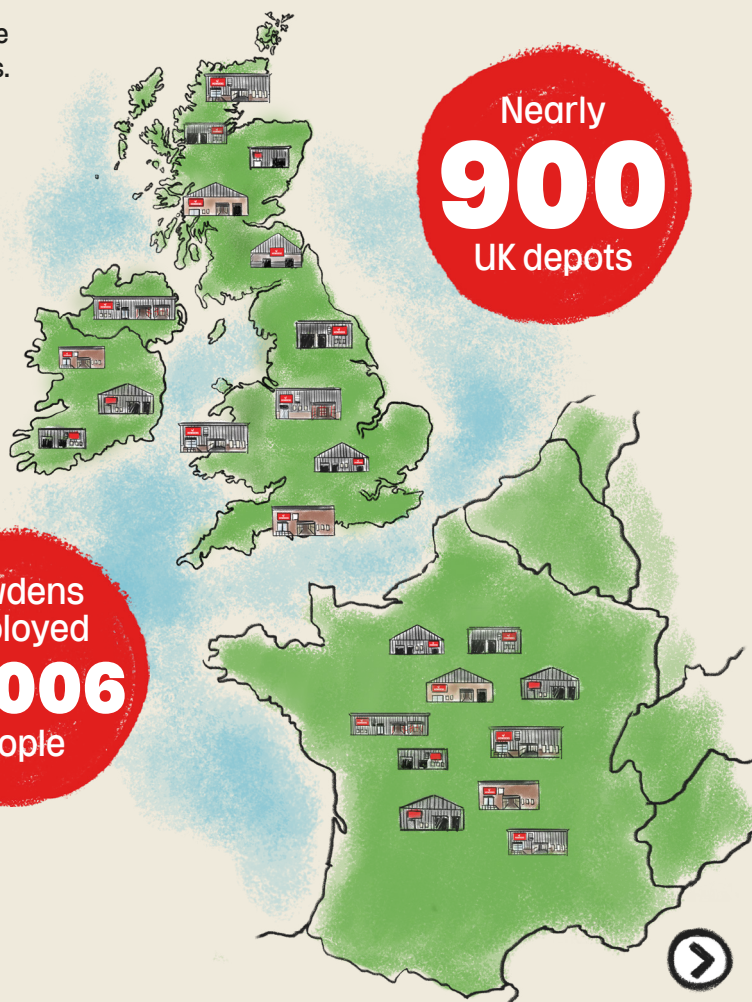
Howdens was founded on the principle that the business should be Worthwhile for ALL concerned – customers, homeowners, tenants, local communities, our suppliers, our investors, our staff and their families. This founding principle has shaped our business model and our strategic decisions since 1995, and it continues to be at the heart of what we do.



Howdens' scale

In the 2025 financial year, Howdens reported Group revenue of £2.4 billion, of which c. 96% was from UK sales. It also manufactured 30 million, bought in goods representing £540m, and made 367,000 deliveries to depots.

At the end of the 2025 financial year, Howdens directly employed 12,006 people, 11,982 of whom were employed in the UK.



Policies on Modern Slavery

Howdens' approach to Human Rights

At Howdens, we're committed to supporting and respecting the protection of internationally proclaimed human rights ('Human Rights') wherever possible. We know that our business operations and the operations of our global supply chain could impact Human Rights, so we have a Human Rights Policy, which is reviewed annual by our Board of Directors. The Human Rights Policy applies to all our Operational Locations and to all officers, directors, employees, and anyone working for us in the course of their employment ('Staff'). It states that we expect all contractors, suppliers, agents, consultants, and other business partners ('Suppliers') to join us in our commitment to respect Human Rights. The policy provides that, 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 if they breach relevant laws and/or act in a way that is contrary to the principles of this Human Rights Policy. The policy specifically calls out "Freedom from slavery" as one of the Human Rights we believe are most salient to our global Suppliers.

We also have a Board of Directors-approved Whistleblowing Policy. This policy is available in all our Operational Locations and sets out how any external or internal party can report concerns or raise issues related to our direct activities or indirect activities (such as those in our supply chain). Concerns can be raised via a confidential telephone service or a dedicated website.

All contact channels are available in multiple languages and are administered by an independent third party. Twice a year, our Board of Directors receives a report on whistleblowing instances. In 2025, there were no incidents of modern slavery nor human rights abuses reported to the whistleblowing facility.

In addition to our Human Rights Policy and Whistleblowing Policy, we have a Supplier Code of Conduct, which is detailed later in this statement.

The Board of Directors for Howden Joinery Group Plc are collectively responsible for developing the strategy of the Group and ensuring there are sufficient resources to successfully implement that strategy. This includes the determining the Group's approach to Human Rights and the framework for the assessment of modern slavery risk. The Board provide counsel and constructively challenge the performance and decisions of the Executive Committee in their day-to-day running of operations. Operational management includes the identification, assessment and response to instances of Human Rights violations and modern slavery concerns where they arise.

In addition to this, the Audit Committee (a sub-committee of the Board) receives two updates per year on supplier governance from the Executive Director responsible, which includes compliance scores and issues (if any) relating to modern slavery.

The Board are also responsible for setting and protecting the culture and values of the business - a role particularly pertinent to Howdens where integrity, respect, individual accountability and recognition are fundamental tenets of the business.



Howdens Due Diligence Process

We review our risk profile for modern slavery annually, with the output presented to the Executive Committee. Our risk assessment ensures that our due diligence processes address the correct areas, and that mitigations are reviewed for effectiveness. The high-risk areas for Howdens to modern slavery are:

- Modern slavery in the supply chain of our goods for resale (GFR), primarily in high-risk territories (see Supply Chain Overview)
- Modern slavery in our agency labour used to support seasonal fluctuation in demand and the operation of the business (see Labour Supply Overview)
- Modern slavery in our supply chain for goods not for resale (GNFR), primarily in higher risk areas such as agency labour to support our depot network and manufacturing sites (e.g. cleaning staff).

Supply Chain Overview

Howdens' success is underpinned by our commitment to fostering long-term, trusted relationships with our stakeholders, particularly our Suppliers. We prioritise sustained partnerships over short-term or spot purchasing, resulting in a significant proportion of our Suppliers having medium or long-term contracts with us. This approach enables suppliers to establish profitable, stable businesses through collaboration with Howdens.

In return for the benefits that come with working alongside Howdens, we expect our Suppliers to operate with integrity and to uphold standards that respect Human Rights. Our expectations and requirements around Supplier behaviour are formalised in our supply contracts and the Supplier Code of Conduct, which is detailed later in this statement. These measures are designed to ensure that all Suppliers adhere to our values and maintain ethical practices throughout our supply chain.

Our primary suppliers operate in 28 countries, with the majority (62%) located within the United Kingdom, an additional 33% based in Europe, and the remaining 5% situated in Asia. We recognise that there are salient Human Rights issues in some countries that we source from, so we employ processes, including regular assessments and audits, to help mitigate the risk that we are engaged with any supplier that does not share our values and adhere to local laws

and regulations. Our supply chains do not extend into Sub-Saharan Africa, a region identified as having a higher risk of human rights violations.

Labour Supply Overview

Much of our labour force is directly engaged by Howdens and further detail on our recruitment processes are set out below. In the lead up to, and during our peak trading season, we also recruit an additional c.1200 staff members through local agencies. These agencies are long-standing suppliers to us with agreed contractual terms containing legislative controls and checks e.g. Right To Work and suitable background checks. All vendors complete a procurement questionnaire before enrolment and agreeing terms.

- The agency must only introduce candidates who have:
 - Provided verified qualifications and authorisations.
 - Passed agency screening
 - Had their right to work verified according to UK regulations.
- The agency must comply with all relevant UK laws, including the Immigration Acts and codes of practice regarding labour movement reporting.

When recruiting new employees, we have processes in place that must be followed, to keep them safe and to identify any signs of potential modern slavery.

Managers must:

- Follow the agreed recruitment processes to ensure the risks of modern slavery are mitigated
- Only use approved employment agencies to source labour
- Ensure new employees have received their day 1 documents
- Not accept bribes to recruit or favour workers under any circumstances.
- Ensure a first day Right to Work check is completed
- Ensure bank account details on the system are in the name of the employee

We also conduct 1st Day check to ensure Bank Details of new employees are validated.



Business Areas High-risk Supply Chain

Our Supply Chain - Goods for Resale Suppliers (GFR Suppliers)

Our supply chain consists of suppliers and service providers both within the UK and internationally, covering goods, raw materials, and services required for our business activities. We recognise that risks of modern slavery can arise at various points in the supply chain, particularly where there are complex sourcing arrangements or suppliers based in higher-risk countries such as China, Malaysia, India and Indonesia.

Supplier Code of Conduct

All Suppliers, agents, contractors, consultants, distributors, and other third parties engaged by Howdens are required to comply fully with all applicable modern slavery and anti-trafficking laws. Under no circumstances may Suppliers engage in any activity that involves modern slavery, forced labour, or human trafficking when acting for or on behalf of Howdens. This requirement extends to all tiers of the supply chain, including subcontractors, distributors, and agents.

Suppliers must maintain transparency and co-operate fully with Howdens during any due diligence processes. This includes providing relevant information about their business structures and operations, enabling Howdens to conduct appropriate and proportionate assessments to safeguard against risks of modern slavery and human trafficking within the supply chain.



Effectiveness in ensuring modern slavery isn't taking place

Due Diligence and Risk Assessment

We conduct thorough due diligence on all new and existing suppliers. This includes risk assessments based on the country of origin, type of product or service, and the nature of the supplier's workforce. We prioritise suppliers in sectors and regions with a higher-risk of modern slavery for additional scrutiny using multiple recognised tools and information sources.

Our due diligence process includes:

- Requiring suppliers to complete questionnaires regarding their labour practices and policies.
- Reviewing supplier certifications and compliance with recognised ethical standards.
- Conducting audits or site visits where appropriate, particularly for suppliers in higher-risk categories and reviewing audit actions.

We use the SAP Ariba SLP (Supplier Lifecycle and Performance) system and the SEDEX (Supplier Ethical Data Exchange) platform to gain visibility over the supply chain, focusing on labour standards, health & safety, business ethics, and environmental practices. Through SEDEX, Suppliers are required to register all relevant manufacturing sites and complete the SAQ (Self-Assessment Questionnaire), with site and audit visibility granted to Howdens. Where appropriate, SMETA (SEDEX Methodology Ethical Trading Audit), or equivalent are uploaded to support submissions. The information gathered is used to assess Suppliers' ability to meet the standards outlined in our Supplier Code of Conduct, including those related to modern slavery.



At present, 95% of our primary (Tier 1) suppliers share their ethical data via the SEDEX platform. The remainder provide this information directly from their own mature compliance programmes are typically associated with very large companies. When we use agents or purchase products from distributors, we require third-party manufacturers to connect with us on SEDEX as well. More than 290 manufacturing sites across 28 countries are now linked with Howdens on SEDEX. Our Procurement Compliance Team regularly performs risk assessments using the SEDEX Risk Assessment tool and reviews SMETA non-conformances and follow-up actions. We classify audit non-conformances by severity: business critical, critical, major, and minor. All business critical and critical non-conformances are escalated to the Commercial Director, who, together with Category Heads, is fully responsible for implementing any necessary improvements within their supplier portfolios.

Periodic monitoring of higher-risk areas within the supply chain is undertaken through methods such as regular SMETA audits, site visits, or requests for additional information. All activities are conducted with transparency, and relevant findings are appropriately communicated to Suppliers. Adherence to the Supplier Code of Conduct, as well as our due diligence commitments, are reviewed by senior management at the quarterly Supplier Governance Forum.



Remediation and Grievance Mechanism

If any instance of modern slavery is identified, we would collaborate swiftly with the supplier to implement corrective actions. Where necessary, we terminate relationships with suppliers who fail to remediate issues or cooperate with our investigations. All cases are reported to senior management and, where appropriate, to relevant authorities. We encourage suppliers to maintain robust grievance mechanism and ensure employees are aware of how to raise concerns confidentially.

Key Metrics

Metric	Value
Key suppliers share ethical data on SEDEX	95%
Assessed suppliers with formal grievance mechanism	95%
Assessed suppliers with detailed modern slavery policy communicated to all employees	84%
Employment sites on SEDEX classed as high-risk	10%
High-risk sites with recent ethical audit ¹²	80%

- 1) A recent audit is within the last 2 years, in line with SEDEX methodology.
- 2) Our improvement plan will ensure that we have audited all of our high-risk sites by H2 2026.

Continuous Improvement

We regularly review and improve our practices by monitoring legal changes, updating risk assessments, and engaging suppliers for increased transparency and ethics. Our main goal is to expand SEDEX lower-tier supplier use to boost supply chain transparency and traceability. We will increase audits and site visits by building on our mature product quality audit process to further capture modern slavery and other ethical risk assessment areas. To support this, we are enhancing supplier engagement, encouraging robust grievance mechanisms, and promoting anti-modern slavery policies. By working with industry partners and following best practices, we aim to strengthen our supply chain and protect worker welfare.

Goods and Services not for Resale (GNFR)

In 2026 we will be extending our due diligence process, Supplier expectations and requirements, as currently mandated for our Goods for Resale (GFR) Suppliers to include the Group wide, Goods and Services not for Resale (GNFR) supply base.

The Group wide GNFR supply base provides the goods and services we need to operate our business and includes Transport & Logistics, Warehousing, Waste Management, Employment Agencies, Marketing, HR, Facilities Management, Materials Handling and IT equipment & Software. The GNFR supply base comprises in the order of 1,500 active suppliers with 75% of the total spend being with the top 100 suppliers.

Through 2026 our immediate attention will focus on those GNFR Suppliers who are classified as Critical or identified as high risk by way of our Supplier Risk Assessment tool.



Training and Awareness



In 2025 we strengthened our Modern Slavery Awareness training to include more focus on Human Rights and more practical scenarios, with the training continuing to be mandated to over 10,000 people across all depots, support functions and operations.

This training plays a critical role in helping our people:

- Develop their knowledge of human rights and modern slavery principles
- Spot the signs of modern slavery
- Understand what they should do if they need to report anything

We have firmly embedded this training within our business, with 97% of employees having completed this training, which is refreshed every two years and is available via the learning system.

In 2025, we have also developed and trialled Sustainability (ESG) training, with part of this training focusing on human rights and modern slavery. This training will be made available to employees in relevant roles in 2026 and will help to further develop people's knowledge of the steps we take as a business to minimise the risk of slavery and their responsibilities in helping the business do this.

Completion of the Chartered Institute of Procurement and Supply Chain (CIPS) Ethical qualification is mandatory to all core Commercial employees, with 100% of people having completed this qualification who are required to do so.

This training plays a critical role in helping our people in the Commercial team to:

- Know tasks associated with each stage of the sourcing process
- Understand the significance of ethics for procurement and supply
- Apply techniques that can achieve added value

In 2026, we'll create Howdens specific training on ethical procurement. This training will be available via the learning system to all core Commercial employees, and this training will be refreshed annually. This will ensure that people in critical sourcing roles receive in-depth, bespoke training which focuses on what we do as a business to source ethically from suppliers around the world, the risks associated with this, and the steps they can take to minimise these risks.

In 2026, we'll engage with key suppliers from our supply chain to enable them to:

- Demonstrate they are providing appropriate training to raise awareness of modern slavery risks and mitigation steps within their business.
- Provide data / evidence to confirm their people have completed the training.
- Confirm they have steps in place to ensure the training is refreshed on a regular basis.

We'll continue to ensure modern slavery is a focal point during our quarterly business reviews and supplier engagement events.



Jackie Callaway
Chief Financial Officer
Howden Joinery Group Plc

