

# Modern Slavery Statement

PS-005

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Position: CEO

Signature: 

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## Modern Slavery Statement

### Introduction.

The Modern Slavery Act 2015 requires manufacturers and retailers, doing business in the UK, to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain, and within their business. This requirement relates to business' who supply goods and services, and meet certain criteria outlined within the Act itself.

This statement outlines the measures we take at Graham & Brown Ltd to ensure our supply chain, and business, are not involved in modern slavery or human trafficking.

### Our business and supply chain.

Graham & Brown Ltd are the UK's largest wallpaper manufacturer, founded in 1946 by two dear friends, Harold Graham and Henry Brown. With our head office based in Blackburn, England, and operating internationally from divisions based in Europe and North America, we sell wallcoverings to over 70 countries worldwide. Our business is compliant with all applicable laws and regulations, including those relating to the hiring and retention of our employees; furthermore, we operate our day-to-day sourcing responsibly and help our local communities. Here at Graham & Brown Ltd, we actively promote a diverse culture and build the business on a foundation of honesty, integrity, fairness, and trust.

From sourcing raw materials from responsible sources, to developing long-term supplier relationships, we promote transparency and trust throughout our supply chain, and expect our suppliers to conduct their business activities to similarly high moral and ethical standards. We, at Graham & Brown Ltd, are committed to ensuring there is no place for, or any acceptance of, modern slavery or human trafficking within any stage of our supply chain.

### Due diligence, risk assessment, and measuring effectiveness.

A commitment to eradicating modern slavery and human trafficking from our business and supply chain is all very well and good, but without the implementation of suitable due diligence and risk assessment it would be useless. To back up our commitment, Graham & Brown Ltd have systems in place to ensure our own business, and those involved in our supply chain, are subject to regular social, ethical, and operational based audits. A standardised approach is taken to such audits to ensure a fair and consistent approach is taken to all suppliers without our supply chain. Audits are conducted, documented, reviewed, and findings fed-back to suppliers; help and assistance is given to suppliers who are found to be non-compliant with our expectations and requirements. Suppliers are awarded a grade based on their audit score. Those suppliers achieving a grade A or B become approved suppliers, whilst grade C rated suppliers are put on hold until necessary improvements are made. Grade D rated suppliers will not be sourced from until critical improvements are made and re-audits are conducted.

Suppliers found to be in serious breach of expectations and requirements, including the involvement in modern slavery or human trafficking, shall be terminated from our supply chain with immediate effect.

In addition to the auditing of our own supply chain, we regularly undergo a 2-Pillar Sedex Members Ethical Trade Audit (SMETA) within our own business. These are conducted by a third-party audit company to ensure complete impartiality and independence; this is one of the most widely used social audit procedures in the world. The scope of the SMETA audit is in-line with the standard requirements, covering:

- ETI base code.
- Universal rights covering UNGP.
- Management systems and code implementation.
- Responsible recruitment.
- Entitlement to work and immigration.
- Sub-contracting and home working.

We extend the requirement to complete third-party SMETA audits to those suppliers deemed to be at higher risk of being involved in modern slavery or human trafficking. For example, in addition to our own supplier audits, which cover aspects such as forced labour, all our China based suppliers are also subject to periodic, third-party led SMETA audits. Links to relevant suppliers are maintained within the Sedex online portal, ensuring clear visibility of our higher risk supply chain.

### Modern slavery and human trafficking risks.

Whilst we accept that modern slavery and human trafficking risks likely exist within all countries, and across all aspects of our supply chain, it is generally accepted there is a higher risk of these issues being more prevalent in countries outside of Europe; especially for suppliers based in places such as China and India for example. Although this does not detract from the need for us to ensure appropriate due diligence and controls exist across our entire supply chain network, it does result in a greater emphasis being placed on these issues in countries, or regions, believed to be at higher risk.

### 2021 overview.

- 9 supplier audits completed.
- 0 identified non-compliances relating to modern slavery or human trafficking.
- 0 address non-compliances relating to modern slavery or human trafficking.
- 0 suppliers deemed unsuitable to work with.