Roys (Wroxham) Limited
Modern Slavery Statement

At Roys we are committed to supporting human rights and we take seriously, our responsibilities under the Modern Slavery Act 2015. We have a zero-tolerance approach to slavery and human trafficking and are dedicated to understanding the risks so that we can work towards ensuring that there is no modern slavery in our business or supply chains.

About Roys

A family run business since 1895, Roys department stores are located across Norfolk & Suffolk, surrounded by East Anglia's scenic countryside and the Norfolk Broads.

The following statement applies to all branches of the Roys group, including a garden centre and nursery under the brand name “Highway Garden & Leisure” and a petrol station trading as Broadland Motor Company Ltd. The group operates out of town department stores retailing a wide range of consumer goods, including food, gardening, household, DIY and fashions.

Our Supply Chains

In the financial year from 29 January 2023 to 27 January 2024, Roys continued its commitment and activities to combat instances of slavery and human trafficking within its business and supply chain.

Roys supply chain consists of the supply of goods and services required to support the delivery of the organisations trading activities.

Certain suppliers are engaged with on a seasonal basis which would include local fruit and vegetable growers. Trading can also be seasonal with our Wroxham stores being particularly busy over the various school holidays. At these busy times we recruit temporary staff to provide continued good customer service which can increase staffing levels by between 8% to 12%. At Roys we recognise the responsibility that we must buy, produce, and sell products in an ethical and responsible manner. This responsibility extends beyond our direct suppliers to the entirety of our supply chain. We will not tolerate abuses of basic human rights, such as the exploitation of vulnerable workers, forced labour or human trafficking.

There were no substantial changes to Roys supply chain during the financial year, and it remains compliant with the requirements of the Modern Slavery Act 2015.

Our anti-slavery initiatives and policies

We recognise that our employees are fundamental to our business and as such ensure our own employment procedures and checks minimise the risk of any kind of modern slavery practices taking place within our own business.

We implement ‘right-to-work’ checks on all new employees, undertake regular checks on shift-patterns and the hours worked by employees and understand the importance of focusing on having a culture of engaging in all activities with respect and fair treatment of others.

We encourage our colleagues to report any ethical concerns, and our Whistleblowing Policy, which form part of our Staff Handbook, enables confidential whistleblowing disclosures. We aim to ensure

that appropriate protections are in place for any colleague who raises a concern, without fear of retaliation.

Modern slavery remains a fixed agenda item at the quarterly senior management meeting with any relevant issues discussed.

Mental First Aiders remain in place across our sites and are trained to look out for changes in behaviours and signpost people to the wellbeing services they need. In addition, we have increased our communication regarding employee wellbeing, with regular hints, tips and advice on how to better manage wellbeing.

Considering the requirements of the Equality Act 2010, the business needs, and the Modern Slavery Act 2015, we have further tightened our recruitment process and do not recruit any person that has not reached school leaving age.

Training

We recognise that awareness amongst our colleagues is important in preventing modern slavery. Our new leaders are taken through an extensive training programme that includes looking for any indications which may aid in the detection and prevention of modern slavery. We also have physical and Mental Health First aiders across the business, that can support and signpost employees where necessary. Modern slavery is an essential induction training module for all new employees and an awareness poster campaign was implemented across all stores and Head Office.

Due diligence processes for slavery and human trafficking

When taking on new suppliers in areas which we consider to be higher risk, we have sent out modern slavery questionnaires and will cease trading with suppliers that do not meet our requirements in terms of their modern slavery commitment.

It is the responsibility of all senior managers to ensure that any procurement or hiring undertaken within their areas follows Roys policies and procedures.

Update on activity following Roys 2023 statement

- Modern slavery training was reviewed and updated and leaders across the business were required to complete the training.

- We have created a new agricultural supplier modern slavery questionnaire and sent this out to relevant companies.

- We've reduced reliance on third party service providers by bringing cleaning services in-house. The transferred employees consequently benefit from our policies and procedures as described in this statement. It has also led to more assurance that employees transferred over are compliant with employment regulations such as the Working Time Directive and Right To Work.

Looking ahead to 2024/25

We are proud of the steps which Roys has taken so far to combat modern slavery and human trafficking. However, we recognise that this is an area which requires continual monitoring and improvement, and we will continue to do this. Steps which we intend to take on an ongoing basis include:

- Monitor the on-going revisions to the Modern Slavery Act and adapt our approach accordingly.

- Continue to focus on ensuring current suppliers, with a particular focus on agricultural suppliers, meet the requirements of the Modern Slavery Act as well as building relationships with new suppliers that share our values.

- Continue to keep training under review to ensure it remains appropriate. This will include specific communication and training relating to modern slavery as well as a review of all policies relating to Recruitment, Wellbeing and Equality, Diversity, and Inclusion.

- Following on from cleaning services going in-house, we will be contacting other third-party service providers to ascertain whether they are compliant with Modern Slavery regulatory requirements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Roys (Wroxham) Ltd slavery and human trafficking statement for the financial year ended 27 January 2024 and was approved by the Board of directors on 20 August 2024.
Signed,



Ed Roy Managing Director