



Statement by the Board of Directors on Human Rights and Modern Slavery*

2024

Made pursuant to Section 54 of the Modern Slavery Act 2015



* All figures contained in this statement were accurate as at 30 December 2024

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Introduction

Howdens is a local business with a global supply chain. It is also a business that employs a significant number of people and, due to the seasonal nature of our business, we engage workers not directly employed by us to meet peak demand. With a large supplier network to also consider, we're always mindful that the risk of modern slavery and of exploitation is not limited to the businesses of our suppliers and could occur anywhere within the sphere of influence of our business.

Set out in this statement are the steps taken during the year and our planned future actions. We work closely with internal and external stakeholders including workers, NGOs, trade unions and industry bodies to safeguard against modern slavery and other human rights violations in both our own business and our supply chain. Our continued efforts against modern slavery in 2024 continued to build on our existing safeguards against human rights violations.

This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement and to demonstrate our commitment on behalf of all companies within the Howden Joinery Group of companies¹.

Howdens supplies trade customers (principally small builders) with a range of kitchens and joinery products that are always available from local stock via our network of nearly 950 depots in the UK and Europe.

Organisational Structure

As a vertically integrated business, we manufacture a significant amount of the products we sell. We have one of the largest rigid cabinet manufacturing capacities in Europe as well as operating a global network of over 200 product suppliers from over 30 countries.

We recognise that there are salient human rights issues in some of the countries we source from. It is imperative that we take every step to minimise the risk of slavery. We work closely with our suppliers to ensure that not only do they meet our specifications in terms of quality, volume, availability and cost, but also that the way they operate and produce these goods is ethical and sustainable.

It is essential that we and our suppliers respect their employees' health, safety and welfare in terms of working conditions and rights. We have built strong relationships with our suppliers, and this creates an environment conducive to positive change.

We employ processes for continuous monitoring, regular assessment and audit to ensure that suppliers share our own business values and ethics and continue to adhere to local laws and regulations. These are considered in more detail on the following pages.

Internally, we continue to strengthen our focus on all human rights and sustainability matters through investment in our Compliance and ESG teams.



¹ Including Howden Joinery Group Plc, Howden Joinery Ltd, Howden Joinery Corporate Services Ltd, Howden Joinery People Services Ltd, Howden Joinery Properties Ltd, Howden Kitchens Properties Ltd, Howden Joinery Holdings Ltd, Howdens Cuisines SAS, Howdens Cuisines SRL, and Howden Joinery (Ireland) Limited.

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Organisational Structure CONTINUED

Product

90% of the products we supply to the builder are timber or timber-based products. The raw materials we source for our own manufactured products are predominately from UK forests.

Howdens has been approved by Timber Development UK (TDUK) as having an environmental due diligence system in place which is equivalent to their Responsible Purchasing Policy, which means that we have third-party assurance on our timber purchasing due diligence systems. More information about our ethical sourcing of raw materials can be found in our [Sustainability Report](#).

People

In total, Howdens employs over 12,400 people across our depot networks, manufacturing and logistics operations, as well as support functions, in both the UK and Europe. During 2024, Howdens engaged over 1,375 agency workers, predominantly in our manufacturing operations and distribution centres.

Policies & Governance

Howdens has several group wide policies relevant to Modern Slavery all approved at Board level. They promote the observance of internationally recognised labour standards, with particular regard to human rights. In early 2024, we introduced a Human Rights Policy to ensure both internal and external stakeholders understand our commitment. This was rolled out through our Supplier management and onboarding system, SAP Ariba. We will continually review its relevance.

We seek to ensure we are not complicit in human rights abuses by any person or organisation with whom we are affiliated, and we expect everyone to respect human rights.

All our suppliers must agree to comply with the [Human Rights Policy](#).



Areas of Risk

We regularly assess our modern slavery risk profile as part of our wider risk management approach, in particular when the business makes a significant change to its structure or activities. This is discussed with the Executive Committee and Board.

As part of our Corporate Governance Reform project, we have refreshed our wider supplier governance process and mapped our operational controls against these. This is subject to a biannual review. We have also invested in our systems to better enforce controls throughout the supply chain.

Human Resources

Howdens' employment contracts provide that the Company will promote internationally recognised labour standards and that all our employees must adhere to a code of ethics in order to achieve the highest possible standard of integrity in our business relationships. We have specific policies in relation to anti-harassment and bullying.

To further reduce the likelihood of the exploitation of our employees or inappropriate activity by Howdens as a business, a confidential, 24-hour, multi-lingual whistleblowing facility is in place. This is available to all employees, customers, agency workers or contractors and it accepts telephone calls and raising of issues through a dedicated website.

The helpline is advertised on posters in all places of work (offices, depots, and warehouses) and it is administered by an independent third party, with investigations handled by an independent internal team. Howdens encourages all workers, customers or other business partners to report any concerns related to the direct activities or the supply chains of our business. In 2024, there were no incidents of modern slavery or human rights abuses reported through the whistleblowing facility in relation to our business or our supply chain.

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Areas of Risk CONTINUED

Human Resources CONTINUED

The Board of Directors and the Executive Committee receive Whistleblowing updates at least twice a year including case numbers, outcomes and key themes raised. Our facility is available to all staff and stakeholders in all territories in which we operate. In 2024, following improvements in the facility offered we improved our awareness of the facility as well as refining our policies and procedures to make the independence of our Whistleblowing process clearer. We have also reviewed our policies and procedures to ensure that we are compliant with the EU Whistleblowing Directive, as well as local EU state implementation.

No Howdens employees are paid cash in hand. This ensures that we minimise the risk of illegal working as well as modern slavery offences.

Procurement and Supply Chain Operations

Our business and customer requirements are ever-changing and so our supplier network changes to keep pace with our product offering. Recognising our highest exposure to modern slavery risk is through our supply chain, we take a robust and thorough approach to ethical and sustainable procurement.

Our Supplier Code of Conduct and associated Human Rights Policy set our commitment to worker's rights and our expectations of our suppliers regarding topics such as: forced labour, child labour, excessive hours, working conditions and fair pay. It is based on the Ethical Trading Initiative (ETI) Base Code and relevant conventions of ILO.

We use the SEDEX (Supplier Ethical Data Exchange) platform to monitor and assess risks of our suppliers and we require that all employment sites involved in manufacturing products for Howdens (tier 1 & selected tier 2) have their SAQ ("Self-Assessment Questionnaire") completed. We are currently linked with 291 sites, which covers 96% of current suppliers. The remaining suppliers share their ethical data with us by different means, including SAP Ariba.

In October 2024, SEDEX updated their SAQ to enhance the transparency of the recruitment and housing processes for migrant workers. We are actively collaborating with our suppliers to achieve full completion, with 91% of suppliers having completed by end 2024.

We use the SEDEX RADAR tool to actively manage risk in our supply chains. We request that all high-risk sites are audited to the SMETA ("SEDEX Members Ethical Trade Audit") standard every two years.

Our Commercial Director and Category Heads hold full responsibility for implementing any necessary improvement actions within their supplier portfolios.

Communicating with our suppliers

We adopt a top-down, bottom-up approach for communicating with our suppliers. We expect our Category Heads and Buyers to have ongoing engagement with them about environmental and decarbonisation plans, ethical sourcing and modern slavery, regulatory compliance, as well as commercial matters. We expect these conversations to happen at a senior manager and business owner level as well. We only want to work with suppliers who share our ethical values, and we are clear about our expectations, which we aim to align through our whole supply chain.

We continue to recognise there is potential for greater risk exposure around ethical sourcing and modern slavery in our supply chain.

We aim to meet with our main suppliers quarterly. We also bring our suppliers together biennially at a forum to talk about shared issues. As well as talking to our suppliers about new opportunities and product development, we use the supplier forum as an opportunity to repeat and reinforce our expectations for all ESG and ethical behaviours. We tell our suppliers what we need from them, and we work together to produce solutions.

At the 2024 supplier conference, it was cited that ESG and our commitments to the environment and social matters was "non-negotiable", including human rights.

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Communicating with our suppliers

CONTINUED

These events benefit both us and our suppliers and is an example of the principle that our business needs to be “worthwhile for all concerned”.

Our ongoing collaborations with suppliers will strengthen our supply chain intelligence and where necessary will help to resolve any issues.

In early 2024, the business Issued its first Human Rights Policy (see page 3) to all suppliers alongside updated Conditions of Contract (supply of goods) to cover Sanctions and Net Zero Obligations.

Training

Modern Slavery Awareness training was rolled out further in 2024 and is now mandated to nearly 10,000 people across all depots, support functions and operations. The roll-out has been incredibly successful with a completion rate of 94% in operations and 91% in support functions. By the end of 2025 the target is 95% for all staff to have received training. The training is refreshed every two years and is available through our online Academy Learning system.

Completion of the Chartered Institute of Procurement and Supply Chain (CIPS) Ethical qualification is mandatory to all core Commercial staff (40+ employees), and this was recently refreshed by all employees who were asked to complete this qualification previously.

In 2025, we will link and deliver new training modules covering modern slavery and ESG matters. We will review the content of the ethical qualification and look to develop and enhance these materials.

Conclusion

It is a fundamental tenet of the Howdens business that it is worthwhile for all concerned. We know that the social and commercial aspects of our business are inextricably linked. Therefore, we expect that all the people who act for, or in conjunction with, Howdens behave in a manner, both individually and collectively, which adheres to our values.

Howdens is a growing business, and we remain committed to identifying and implementing ongoing improvements to further strengthen our existing safeguards.

Approved by the Board of Directors on 23 April 2025.

Signed on behalf of the Board of Directors by

**Paul Hayes
Chief Financial Officer**

