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AKW Holdings Ltd

Modern Slavery and Human Trafficking Statement

Date of update: March 2025
Due for review: February 2026

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Introduction

This statement constitutes AKW Holdings Ltd Group Modern Slavery and Human Trafficking statement, pursuant to s.54 of the Modern Slavery Act 2015.

This statement relates to actions and activities during the financial year 1st January 2024 to 31st December 2024.

Scope

This policy applies to AKW Holdings Ltd and all its subsidiaries. AKW Medi-Care Limited is a subsidiary of DLP Limited ('DLP'), a company incorporated in the Isle of Man, both of which are owned by the AKW Holdings Ltd group ('Group') which is also Isle of Man based. AKW in turn has a subsidiary, AKW International SA, incorporated in Belgium. Contour Showers Limited is a subsidiary of Elfreed Limited. Elfreed Limited is a subsidiary of DLP Limited.

We recognise that no supply chain is without risk of modern slavery and it is our responsibility to take a robust approach to ensure we understand these risks and work in partnership with our suppliers to mitigate them. We are committed to ensuring that human rights are respected and that we take steps to reduce the risk of slavery or human trafficking taking place within our organisation or supply chain.

Responsibility and review

The HR team prepares this policy and seeks relevant supplier information from the Procurement team to assess the organisation's adherence and progress against the objectives laid out in this policy.

Monitoring and review

This policy is reviewed on an annual basis in accordance with UK reporting requirements.

Performance indicators and impact assessment

We have reviewed our key performance indicators during 2024 (KPIs). As a result, we:

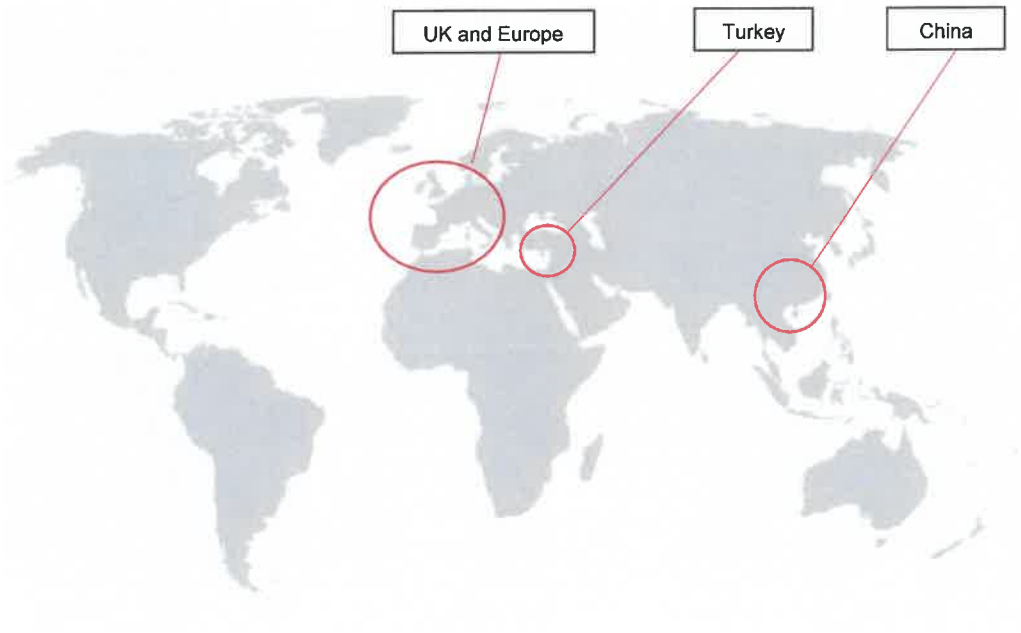
- Require Directors and all employees who work in our product, quality, procurement, engineering and HR teams to complete training on Modern Slavery on an annual basis.
- Require employees in our Finance teams to complete training about anti-bribery legislation and the prevention of money laundering on an annual basis.
- Use SEDEX, an online platform which supports the improvement of the ethical and environmental sustainability of the supply chain, evaluating suppliers. The completion of information in SEDEX is part of the verification process for a potential supplier.
- Require 100% of identity verification checks to be performed in advance of employment using a recognised Identity Service Provider [IDSP].

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Organisational structure and supply chains

The organisation's principal activity is the wholesale supply of showering and associated products for the assisted-living market in the UK.

The organisation's procurement department is located at DLP Limited, in the Isle of Man, which sources both raw materials and finished goods from a wide range of geographic locations, including the UK, Europe (France, Italy, Spain), Near East (Turkey) and Far East (China).



The Procurement team actively manages supplier relationships on a continuing basis via the use of SEDEX. There are detailed policies and procedures in place to help ensure that we only transact with reputable and ethical organisations.

High-risk activities

The organisation is committed to ensuring it does not participate in activities at risk of modern slavery or human trafficking.

We understand that high-risk activities are not solely defined by our direct operations, but also by those of our supply chain. To mitigate these risks, we employ a multi-faceted approach. This includes conducting on-site visits and utilising self-assessment questionnaires via the SEDEX platform to assess sectorial risk, business model risk, and worker vulnerability, ensuring quality outcomes are attained.

Furthermore, we maintain a comprehensive supplier code of conduct, provide regular training to our staff, and actively leverage the SEDEX platform to enhance transparency and reporting.

By implementing these measures, we aim to foster ethical and sustainable supply chain practices.

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There have been no investigations in relation to known or suspected instances of slavery and human trafficking.

Our commitments

Policies

Our Modern Slavery Statement reflects our commitment to act ethically and with integrity in all business relationships. It outlines how the organisation implements and enforces effective systems and controls to ensure modern slavery and human trafficking does not occur within our business and supply chains.

We expect organisations with whom we do business to adopt and enforce The United Nations Guiding Principles on Business and Human Rights (UNGPs).

Our approach to the prevention of slavery and human trafficking corresponds to our commitment to an inclusive culture. We seek to treat everyone with equity, creating a workplace and business environment that is open and transparent. We encourage and expect our people and suppliers to raise concerns so that these can be addressed promptly.

Anti-bribery and corruption policy

The organisation does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The Directors and senior management team are committed to implementing and enforcing effective systems throughout the organisation to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010 (Manx Equivalent : Bribery Act 2013).

Whistleblowing policy

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to increase the risk of slavery or human trafficking.

Supplier / Procurement Code of Conduct

We are committed to ensuring our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate, via their participation in the SEDEX platform, that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of our supplier code of conduct will lead to the termination of the business relationship.

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Recruitment and employment procedures

The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers.

Robust recruitment processes are in place in line with UK employment laws. These include:

- A face-to-face interview with prospective candidates.
- An employment contract being signed prior to commencement of employment.
- An individual's identity being verified in advance of employment using a recognised Identity Service Provider [IDSP] to check their age and eligibility for legal employment in the UK and identification document being returned to them.

Employee Handbooks

The organisation details the actions and behaviour expected of employees when representing the organisation in the Employee Handbook, this includes an individual acting negligently by failing to report a concern about slavery or human trafficking.

We expect high levels of employee conduct and ethical behaviour when operating abroad and managing the organisation's supply chain.

Due diligence and risk assessment process

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. This process includes an assessment of whether activities or countries are high risk in relation to slavery or human trafficking. The organisation's due diligence and ongoing reviews include:

- Completion of supplier pre-authorisation questionnaires which have a detailed section regarding ESG principles and the potential supplier must advise the policies and procedures that it adheres to, to ensure it meets the required standard. This includes labour, ethics, health & safety, environmental and anti-bribery policy adherences. If the supplier is deemed not suitable due to non-adherence, then they will not be engaged.
- Key Directors and / or members of the senior management team periodically visit the factories and headquarters of the organisation's key suppliers. These visits help to develop and strengthen supplier relationships and provide the organisation with first-hand insight into the operations and working conditions in place at each of the suppliers' respective businesses.
- Employment of staff is conducted directly in China and is overseen by the organisation. Their role is to ensure that the quality of manufactured products is in line with business requirements, and they also provide a direct day-to-day operational link, with suppliers.
- Assessment of the supply chain is performed to evaluate products and geographical risks of modern slavery and human trafficking.

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- Evaluation of the modern slavery and human trafficking risks of each new supplier is part of our supplier take on process.
- Undertake supplier audits and assessments at supplier selection time as well as follow-up if required due to any performance and/or quality standards shortfall and by default at least every 3 years with a greater degree of focus on slavery and human trafficking where general risks are identified; (i.e geographical area, etc.).
- Maintenance of an annual risk profile for each supplier as per procurement compliance review.
- Use of internet search engines to research supplier history and checking for their labour standards, compliance in general, and in particular, any risks related to modern slavery and human trafficking.

Training

We require Directors and all employees who work in our product, quality, procurement, engineering and HR teams to complete training on Modern Slavery on an annual basis.

In addition, employees in our Finance teams complete training about anti-bribery legislation and the prevention of money laundering annually.

Our modern slavery training covers:

- the organisation's Modern Slavery statement;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and

Future plans and development areas – our commitment

We will remain committed to being ethical and sustainable across our organisation by

- Continuing to education our employees on the risks of slavery within our supply chain and how to identify and manage them
- Work collaboratively with our suppliers to identify opportunities for share best practice and drive improvements .
- Underpinning our approach by UK legislation, EU taxonomy and United National Guiding Principles (UNGPs)

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Future plans and development areas – key performance indicators

The organisation monitors the following KPIs to measure performance

Indicator	2022	2023	2024	Target
% of suppliers who have acknowledged supplier code of conduct	n/a	n/a	20%	100%
% of key suppliers who have completed a virtual audit	n/a	n/a	71%	100%
% of selected employees trained on Modern Slavery	n/a	n/a	100%	100%
% of selected employees trained on Anti-Bribery	n/a	n/a	100%	100%
% of suppliers who have completed onboarding CSR questionnaire	100%	100%	100%	100%
% of employees complete an identity verification check prior to employment start date	100%	100%	100%	100%

Approval

This statement was approved by the Group Chief Executive Officer of AKW Holdings Limited.

Signed by:
Stephen Murphy
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28-Mar-2025 | 10:35 GMT

Stephen Murphy

Date

Record of changes

February 2025	Inclusion of contents page and map showing supplier location Further detail added to Training section.
March 2025	Review of content by Group Procurement Director for accuracy
March 2025	Inclusion of Future plans – KPIs section