

# Karndean's Modern Slavery Statement

This statement sets out how Karndean International Limited trading under Karndean Designflooring ("Karndean") complies with the Modern Slavery Act 2015 (the "MSA") and the guidance in relation to the MSA, which was released by the Government in October 2017. It sets out the steps taken during the financial year ended 31 December 2024 to prevent modern slavery and human trafficking in our business and supply chains.

Previous statements can be found on our website at

<https://www.karndean.com/en-gb/floors/>

Modern Slavery encompasses slavery, servitude and forced or compulsory labour. We recognise that businesses should carry out due diligence to identify risks and implement achievable solutions in order to manage threats to human rights abuses.

# Karndean's Modern Slavery Statement

## **Our business and its supply chain**

Karndean operates across the UK and Ireland through a network of independent retailers, both large and small and also through distributors and merchant counters as well as online. We also work closely with architects, designers, housebuilders and specifiers in the commercial sector as well as public contractors. Our subsidiary companies, Designflooring GmbH, registered in Germany and mFLOR International B.V. registered in the Netherlands operate in mainland Europe. The products we sell are sourced from national and international suppliers including those from Germany, Taiwan, China, South Korea, Vietnam, Portugal, The Netherlands. We are part of a group of Karndean Companies worldwide, with Karndean Holdings Limited (UK), being our parent company.

## **Our Commitment & Understanding of the Impact of Modern Slavery**

Karndean and its subsidiary companies are committed to ensuring complete compliance with the Modern Slavery Act 2015 and demands the same of its suppliers. Karndean is committed to only buying from reputable suppliers that share our values and ethics. It is the company's moral and ethical responsibility to ensure that all individuals are treated fairly and respectfully whether in the manufacture and sale of its products or in the services we procure in the course of business. Ownership of this policy resides with the leader of the business but is fully adopted and adhered to by all its employees and we endeavour to ensure that it is also adhered to by customers, suppliers, contractors and consultants.

## **Our Policies and governance**

Karndean has established an internal Code of Conduct on Ethical Sourcing. This details how we comply with the legislation which is applicable to Ethical Trading, and also sets out the standards we expect of our suppliers and of our employees. In particular, this code of conduct addresses such matters as: conditions of employment; wages and benefits; child labour; modern slavery (which may also be referred to as forced labour) and human trafficking. We request assurances from all major suppliers each year that they at least adhere to the same policies as Karndean in their working practices. All new suppliers are also evaluated in line with our current policies and all requisite background, visa and permit checks are made when hiring new employees whether directly or through recruitment agencies. We use, professional and respected recruitment agencies with whom we have long-lasting relationships.

During 2024, the Karndean Group became a member of the SEDEX Community and our main suppliers also joined us in becoming members.

We have used the most comprehensive of the SEDEX frameworks to assess the performance of our product suppliers in 2024. These 4 pillar audits focussed on the business ethics, labour conditions, social performance and environmental performance.

## **Risk Management**

Established in 2021, our Risk Committee's work continued in 2024 and ESG is a standing item at each Risk Committee meeting where company policy on Modern Slavery among other ESG items is reviewed and assessed. Any specific matters are highlighted to the UK

Board and to the Holding Company's Risk Committee for further review and recommendations.

Our Evolve strategy continued apace in 2024 with the establishment of a maturity model to lay out expectations on supplier sustainability performance. Within the model we have embedded explicit requirements for employee codes of conduct that the suppliers must adhere to.

### **The due diligence processes in relation to modern slavery and human trafficking**

We assess any instances of non-compliance on a case-by-case basis and will tailor any remedial action appropriately. We will only trade with those companies which comply with these requirements.

### **Our risk assessment of modern slavery or human trafficking taking place, and the steps we have taken to assess and manage that risk**

Like many businesses with international supply chains, we consider that any risks of Modern Slavery are greatest within that supply chain although our Modern Slavery Policy applies equally to suppliers in the United Kingdom.

- Our business does not operate in any of the industries stated to be at higher risk of Modern Slavery
- The responses from suppliers to our supply chain audits have been positive. We propose remedial actions to our suppliers should any of them not meet our standards.

### **Karndean remains committed to further enhancing its approach to and understanding of modern slavery concerns**

#### **The training available concerning modern slavery and human trafficking**

Karndean employees each received training in a variety of areas relating to how we seek to operate as an ethical business. This includes amongst other things: Anti Bribery and Corruption training, equity, diversity & inclusion, health and safety, data protection and preventing workplace harassment. These training needs are reviewed periodically and will be further refreshed and delivered again when appropriate.

KPI for 2024

Target

All current employees to undertake e-learning module on Modern Slavery by the end of 2024 on our in-house HR & learning platform. New employees have 1 month to complete all mandatory training.

Measured by

E-Learning module has a comprehension certificate at the end of the course which all employees will be required to pass

Results

By the end of 2024 95% of all employees had completed the training.

2025 Targets

1. We shall continue to ensure that all employees, (current or new starters) undertake the e-learning module on Modern Slavery.

Measured by - E-Learning module has a comprehension certificate at the end of the course which all employees will be required to pass

2. We will update our Code of Conduct on Ethical Sourcing to ensure it remains contemporary in relation to all relevant international laws.

Measured by - implementation of revised Code of Conduct by end of 2025 to Karndean UK and all subsidiaries.

This statement was approved by Fleur Carson, Managing Director, for and on behalf of Karndean Designflooring on **21<sup>st</sup> May 2025** and will be reviewed on an annual basis.

A handwritten signature in blue ink that reads "Fleur Carson". The signature is written in a cursive style and is underlined.

Fleur Carson, Managing Director

Previous statements can be found here [\[insert hyperlink\]](#)