Modern Slavery and Human Trafficking Statement

Financial year ended 28 March 2026

1. Statement and statutory basis

This statement is published by Interfloor Group Limited (company number 05516829) for the financial year ended 28 March 2026, with reference to section 54 of the Modern Slavery Act 2015. It sets out the steps we took during that year to ensure, so far as we are able, that slavery and human trafficking are not taking place in our own business or our supply chains, and where our understanding remains incomplete.

Interfloor Group Limited's turnover exceeds the £36 million threshold in section 54(2). The statutory duty of our UK entities is discharged through the group statement published by Victoria PLC, which covers Victoria and its UK subsidiaries. That statement expressly excludes non-UK subsidiaries, so this statement is the only document covering our European operations.

Relationship to the Victoria PLC group statement

Victoria PLC publishes an annual group statement, most recently for the year ending 29 March 2025, approved on 20 March 2026. It is linked from the same page and should be read alongside this one.

This statement is published in addition to the group statement, not in place of it, and gives the operational detail a group statement cannot carry. It is consistent with the group statement, creates no conflicting commitment, and has been approved by the Board of Interfloor Group Limited and signed by one of its directors.

2. Organisational structure, business and supply chains

Our business

Interfloor Group Limited is one of Europe's largest manufacturers and suppliers of floorcovering underlays and accessories. We operate from sites in the United Kingdom and the European Union. Our principal products are bonded polyurethane foam underlay manufactured from reclaimed foam, sponge and crumb underlays, and a range of accessories including adhesives, tapes, tools and trims.

We employ approximately 375 people in total, of whom 350 are at our United Kingdom sites. Our entire workforce is employed directly across all UK and European sites. We use no labour providers and no agency or temporary workers, including at seasonal peaks, a position confirmed for our European operations as well as the UK. We do engage contractors for services on our sites, addressed at section 4.

Our European operations are small relative to the United Kingdom. They are included within the scope of this statement and of our Modern Slavery and Human Trafficking Policy because they form part of Interfloor Group Limited, and because the Victoria PLC group statement does not reach them.

Our supply chain

Our supply chain is global. During the year we purchased from 143 suppliers of materials that go into our products, with the largest ten accounting for 56 per cent of that spend. Including indirect categories such as engineering, marketing and services, we transacted with 561 suppliers in total, with the largest ten accounting for approximately 52 per cent of total spend. We group the supply base as follows:

We group our supply base into the following categories for the purpose of understanding risk:

Category	What it covers	Principal sourcing regions
Reclaimed foam feedstock	Post-consumer and post-industrial polyurethane foam collected, sorted, baled and shredded before delivery to site	UK and EU
Chemicals and binders	Adhesives, prepolymers, additives and process chemicals	UK
Oils and rubbers	Process oils and rubber inputs used in manufacture	Mainly EU, also Asia
Packaging	Film, core, board, pallets and labelling	UK, EU and China
Logistics	Road haulage, container freight, warehousing and pallet networks. UK movements are arranged by our own logistics department	UK and EU
On-site contracted services	Engineering and maintenance, cleaning, security, catering, waste management and construction contractors	UK and EU
Goods for resale	Accessories and tools bought finished and sold under our brands	China and EU

What we do not yet know

Our visibility is strongest at tier one, where we contract directly. Below tier one it is materially weaker. We do not currently have full visibility of:

- the collection and sorting operations behind our reclaimed foam feedstock, several tiers removed from us and labour intensive;
- haulage and freight movements outside the United Kingdom, which are placed through third parties. UK haulage is arranged by our own internal logistics department, so oversight there is direct;
- the manufacturing sites behind our goods for resale and part of our packaging sourced from China, where we buy through distributors rather than direct from the producer. This is where visibility is weakest and exposure highest.

We report this openly because absence of identified risk is not absence of risk. Improving mapping below tier one is a priority for the coming year, at section 8.

3. Policies

The following policies govern our approach. Each is owned by a named member of the senior management team and is subject to periodic review.

Policy	What it does
Modern Slavery and Human Trafficking Policy	Prohibitions, responsibilities, risk assessment method, reporting routes and remediation. Controlled document, reviewed annually.
Ethical Trading Policy	Commits us and our suppliers to the ETI Base Code as a minimum.
Supplier Charter	Contractual commitments on forced labour, voluntary employment, minimum age, wages, hours and cascade to suppliers' own supply chains.
Raising concerns	Concerns may be raised with any line manager, with the senior compliance officer or with Human Resources, or independently and confidentially with the Modern Slavery and Exploitation Helpline on 08000 121 700, which operates 24 hours a day and is open to anyone, including workers in our supply chain. Victoria PLC is extending a group whistleblowing platform across its regions; it is not yet available to Interfloor.
Recruitment and Right to Work Procedure	Right to work, age verification, bank account and address checks, and the prohibition on worker-paid recruitment fees.
Contractor Management Procedure	Approval, induction and supervision of contractors on our sites.

Victoria PLC maintains a group Anti Modern Slavery Policy, which our own policy implements at Interfloor Group level rather than replaces. Our commitments align to the Ethical Trading Initiative Base Code and the relevant ILO conventions on forced labour, freedom of association and minimum age. We maintain membership of Sedex.

Oversight sits with the Board of Interfloor Group Limited and, above it, the Victoria PLC board. The Risk and Compliance Manager is our senior compliance officer for anti-slavery and human trafficking and prepares the annual report on procedures, audit results and supply chain experience. That report is presented to the Board by the Chief Executive Officer. Any suspected breach is reported to the Board without delay and escalated to Victoria PLC where it engages the group statement or another group company.

4. Due diligence

In our own operations

We employ our workforce directly. No labour providers, agencies or temporary workers are used at any UK or European site, a position reviewed and confirmed by Human Resources monthly. Our controls include:

- right to work checks on every new starter before employment begins, retained on file, including verification that the person is of legal working age;
- written contracts of employment issued to all employees; in a language they understand;
- pay at or above the statutory minimum for the individual's age band, reviewed annually, with no deductions as a condition of obtaining or keeping work;
- a prohibition on any worker paying a fee to obtain work with us, whether directly or through a third party;
- verification at right to work stage that the wage account is in the employee's own name and matches the identity documents checked, and re-verification whenever bank details change during employment, a change part way through being a stronger indicator than a mismatch at hire;
- an exception register for any payment to an account not held in the employee's sole name, with the relationship evidenced and the register reviewed annually, plus annual screening of payroll records for duplicate home addresses and contact numbers across unrelated employees, which name matching alone does not detect;
- a prohibition on holding original identity documents belonging to workers.

At the year end, one employee was paid into an account held in the name of their spouse. The identity of the account holder and the relationship were both verified and the exception is recorded. No other employee is paid into an account not held in their own name.

In our supply chain

- New suppliers are screened before onboarding for country and sector risk, with a self-assessment questionnaire required from any supplier assessed as higher risk.
- Strategic and key suppliers are required to sign our Supplier Charter as a condition of trading.
- We use SEDEX and SMETA data to assess supplier labour standards, reviewing non-conformances and corrective action plans rather than audit completion alone.
- We carried out 28 supplier site visits during the year, of which 15 included labour standards in scope.

On our sites

- Contractors are approved before mobilisation and are required to accept the Supplier Charter.
- Site induction for contractors and visitors covers the indicators of modern slavery and how to report a concern.

- Cleaning, security, catering and waste services are contracted. These are recognised higher risk services and appear in our risk assessment at section 5.

Remediation

Victoria PLC commits that the group will act promptly and effectively in the best interests of affected workers. This is how Interfloor gives effect to that commitment.

Our first duty is to the affected worker. We secure the safety of the individual, involve the relevant authorities and the Modern Slavery and Exploitation Helpline, and only then determine the commercial consequence for the supplier. Immediate termination is not our default: it can remove a worker's income and drive the problem underground. We work with a supplier that engages constructively on a corrective action plan and exit one that does not.

5. Assessing and managing risk

How we assess risk

We assess risk at category level, combining country risk from recognised external indices and sector guidance; process risk, with attention to labour intensive, low margin, seasonal or heavily sub-contracted activity; our leverage over the supplier; Sedex and SMETA data; and information from customers and industry bodies. Risks are scored for likelihood and severity of harm to workers, not commercial impact on Interfloor, and reviewed at least annually and on material change to the supply base.

Our most salient risks

The areas of highest inherent exposure are set out below, with the controls that reduce them. This is a statement of exposure, not of identified wrongdoing.

Risk area	Why we consider it salient	What we are doing
Goods for resale from China and the EU	Bought finished through distributors, so we hold no direct relationship with every producing site. China carries recognised forced labour risk. This is our largest single exposure	**Our two major Chinese suppliers have been visited and labour audited. Smaller suppliers have not yet been audited. A further visit to China is planned, with the aim of consolidating purchasing on suppliers we have assessed directly.**

Risk area	Why we consider it salient	What we are doing
Reclaimed foam collection and sorting	Labour intensive manual sorting and baling, low margin and frequently sub-contracted across the UK and EU, sitting below tier one where our visibility is weakest	**We have visited the collection areas and operators behind our major suppliers. Ten sorting operations have been audited over the last three years and were assessed as low risk. Coverage of smaller suppliers is still being extended.**
Packaging sourced from China	Commodity, price-led purchasing with limited direct engagement with the producing site, and a proportion sourced from a higher risk geography	**Sourced through established suppliers with audit histories we have reviewed. Assessed as lower residual risk than the geography alone would suggest.**
Oils and rubbers sourced from Asia	Rubber inputs are manufactured in Asia. Natural rubber supply chains carry recognised forced and child labour risk, though our exposure is reduced because we use synthetic rubber only	**We use synthetic rubber, not natural rubber, which removes the plantation-level risk that drives exposure in this category. Supply is contracted through a major international chemicals group headquartered in Italy and delivered from Italy, giving us a tier one relationship with an auditable counterparty.**
Haulage and freight outside the United Kingdom	UK movements are arranged by our own logistics department, giving us direct oversight. Movements outside the UK are placed through third parties, and sub-contracting below the contracted carrier is not visible to us	**The majority of UK haulage is performed in house. The remainder is placed with a small number of sub-contractors used for ten years or more, and with owner-drivers operating as sole traders who are known to us individually. Extending equivalent oversight to non-UK movements is the area we are working on.**
On-site contracted services at all sites	Cleaning, security and waste are recognised higher risk services with transient workforces and multiple layers of sub-contracting. Applies at our European sites as well as in the UK	**All contracted services complete a risk questionnaire before engagement. Cleaning, security and waste are placed with large established providers whose employment practices are open to us, which reduces residual risk in this category.**

Risk area	Why we consider it salient	What we are doing
Construction and project contractors	Project driven labour, short engagements and sub-contracting chains during capital works	**Capital works are infrequent and small in labour terms. Work is placed mainly with local, long-established family firms employing few people, each of whom is known to us directly. We recognise that familiarity is mitigating but not auditable, and questionnaire screening applies here as elsewhere.**

Instances identified

During the financial year we identified no instances or credible suspicions of modern slavery in our own business or supply chain. We recognise a nil return may indicate that our due diligence is not yet sensitive enough to detect exploitation rather than that none exists, and treat it as a prompt to strengthen detection.

6. Monitoring and evaluation

The year ended 28 March 2026 is a baseline year. Our 2022/23 statement set three year coverage targets but established no baseline and reported no progress, and we cannot reconstruct a reliable series. We have re-stated our indicators and recorded our position at the year end. Where an indicator has not yet been measured we say so rather than estimate; measurement of all indicators will be complete by 30 September 2026. Future statements will report movement against these figures.

Indicator	Target	Baseline at 28 March 2026
Strategic suppliers signed to the Supplier Charter	100%	**Not yet measured. Measurement complete by 30 September 2026**
Strategic suppliers with a valid SMETA audit	100%	**Not yet measured. Measurement complete by 30 September 2026**
Key suppliers signed to the Supplier Charter	**80%**	**Not yet measured. Measurement complete by 30 September 2026**
Operational suppliers signed to the Supplier Charter	**70%**	**Not yet measured. Measurement complete by 30 September 2026**
New suppliers risk screened before onboarding	100%	**100%**
Spend covered by a documented category risk assessment	**50%**	**Not yet measured. Measurement complete by 30 September 2026**

Indicator	Target	Baseline at 28 March 2026
Audit non-conformances relating to labour standards closed within agreed timescale	**100% closed**	**100%. No labour standards non-conformances were raised during the year**
Employees in priority roles completing modern slavery training	100%	**82%**
Concerns raised relating to labour exploitation	Reported, not targeted	**None raised**

What we learned this year

The lesson of this year is that we had been measuring activity rather than outcome. Targets were set in 2023 without a baseline, an owner or a reporting cycle, so nothing could be reported against them. Re-basing is a correction, not a reset.

7. Training and awareness

Training is targeted by role rather than delivered uniformly, because the people most likely to encounter an indicator are not the people who make sourcing decisions.

Audience	Content	Frequency
Board and senior management	Legal duties, governance, salient risks, approval of this statement	Annual
Procurement and buyers	Category risk, due diligence, audit interpretation, corrective action. All buyers hold CIPS membership with annual ethical trading recertification	Annual
HR and recruitment	Right to work, age verification, account and address indicators, responding to a disclosure	Annual
Line managers	Recognising indicators and escalating without confronting a potential controller	Every two years
Supervisors and all other employees	What modern slavery is, what to look for, how to report	At induction
Contractors on site	Within site induction	On mobilisation

Training is delivered to the Board and senior management, procurement, human resources and line managers on the cycles above. Supervisors and other employees receive awareness training at induction. This reflects the Victoria PLC group standard, which requires trained personnel to managerial level. The scope and frequency of training is reviewed annually.

8. Effectiveness, and our priorities for the coming year

Assessed against the Home Office Transparency in Supply Chains statutory guidance, our practice is well developed in our own operations and in the governance of this work, and less developed in measurement and in the routes by which a worker outside our direct employment could raise a concern. Our controls over recruitment, identity verification and payment are applied consistently across every site in the UK and the European Union. Our supply chain due diligence is active rather than theoretical: 28 supplier visits during the year, 15 of which covered labour standards, with audit coverage extending below tier one to ten sorting operations over the last three years. Against that, most of our indicators are not yet measured, we cannot yet point to a reporting route that reaches workers in our supply chain, and our visibility of smaller suppliers in higher risk geographies is incomplete. Our priorities for the coming year address each of these:

- **Complete a visit programme to our Chinese suppliers, with the aim of consolidating purchasing on suppliers we have audited directly against labour standards.**
- Complete measurement of all indicators in section 6 by 30 September 2026, giving a full baseline for next year's statement.
- **Bring all employees in roles requiring modern slavery training to full completion, from 82 per cent at the year end.**
- **Confirm and publicise a route for raising concerns that is reachable from every site and open to workers in our supply chain, not only to direct employees.**
- **Replicate in our standard purchasing terms the modern slavery commitments already carried in our Supplier Charter, which every supplier signs, together with a notification obligation and audit rights. Under review for introduction by 31 December 2026.**
- **Publish this statement within six months of the financial year end, maintain it annually, and submit it to the UK government Modern Slavery Statement Registry.**

We are also preparing for the EU Forced Labour Regulation, which from December 2027 will bar from the EU market any product made in whole or in part with forced labour, irrespective of company size or place of incorporation. Given our sourcing from China and Asia, our manufacturing operations within the European Union and our sales into the European market, we have begun assessing our exposure.

9. Approval and publication

This statement was approved by the Board of Directors of Interfloor Group Limited on 13 August 2026. It has been prepared to be consistent with the Victoria PLC group slavery and human trafficking statement and does not replace it.

Gary McEwan

Chief Executive Officer and Director, for and on behalf of the Board of Interfloor Group Limited

Date: 13 August 2026

This statement covers the financial year ended 28 March 2026. It is published at www.interfloor.com with a link from the homepage, alongside the current Victoria PLC group statement, is submitted to the UK government Modern Slavery Statement Registry, and remains available alongside previous years.