

Brintons

Modern Slavery Policy

The Modern Slavery Act 2015

The Modern Slavery Act 2015 ("the Act") requires all businesses to have policies in place to ensure modern slavery within global supply chains does not occur. Brintons Carpets Limited ("Brintons") and its subsidiaries are committed to being responsible organisations and complying with the requirements of this Act.

Section 54 of the Act (Transparency in Supply Chains) requires Brintons to publish a statement on its website regarding the steps taken during the financial year to ensure that slavery and human trafficking is not taking place in any part of its supply chain, or within its own business.

Organisational Structure

Brintons is an international manufacturer and distributor of high quality floor coverings. The Group, headquartered in Kidderminster, specialises in the design, manufacture and distribution of high quality woven carpets and rugs.

Its non-UK subsidiaries are not subject to the Act and therefore do not fall within the scope of this statement. Nevertheless, it is Brintons Group policy that the entire organisation complies with this Act and each of its subsidiaries, wherever located, maintains high standards of integrity and ethical behaviour.

Internal Policies

Brintons has a number of internal procedures in place that contribute to ensuring modern slavery does not occur in the organisation by ensuring all employment and recruitment practices comply with the respective laws in each jurisdiction. This includes the following oversight:

- undertaking documentation checks to ensure employees have the right to work and providing all employees with contracts of employment;
- ensuring all employees are of legal working age;
- meeting all legal requirements for levels of minimum pay and working hours
- rewarding all staff with market-related pay and benefits.

Employees are aware of the need to be diligent and mindful of the obligations of the Company under modern slavery and report any concerns to Management directly or through the company's Whistleblowing procedure.

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Supply Chain

Brintons operates lawfully and ethically, and this encompasses working with suppliers that have similar values. Brintons expects its suppliers to operate in accordance with all applicable laws, including respect for an individual's human rights and the environmental and safety impacts of products and services.

Suppliers must agree to abide by Brintons ethical standards and demonstrate that the following conditions are in place:

- policies, systems and procedures to ensure the prevention of unethical business practices, including, but not limited to, human rights abuses, anti-money laundering, fraud, bribery, corruption, and other improper payments, benefits or gifts;
- procedures to forbid the use of slave labour, child labour or forced labour, or to engage in or support human trafficking;
- to ensure that working hours, wages, overtime pay and working conditions are in compliance with all applicable laws; and
- to provide a safe working environment to protect the occupational health & safety of all employees.

Brintons conducts a risk assessment of all its current suppliers. For those deemed to be operating in higher risk countries, and any supplier who is material to the business, Brintons requires positive confirmation of compliance with the Act.

All new suppliers must provide positive confirmation of compliance before Brintons can conduct business with them.

Brintons is committed to ongoing improvement of its policies, training, and supplier monitoring.

This statement has been approved by the Board of Directors of Brintons Carpets Limited.

Duccio Baldi
Chief Executive Officer
For an on behalf of Brintons Carpets Limited

Published 31st March 2026 (For the financial year ending 4 October 2025)