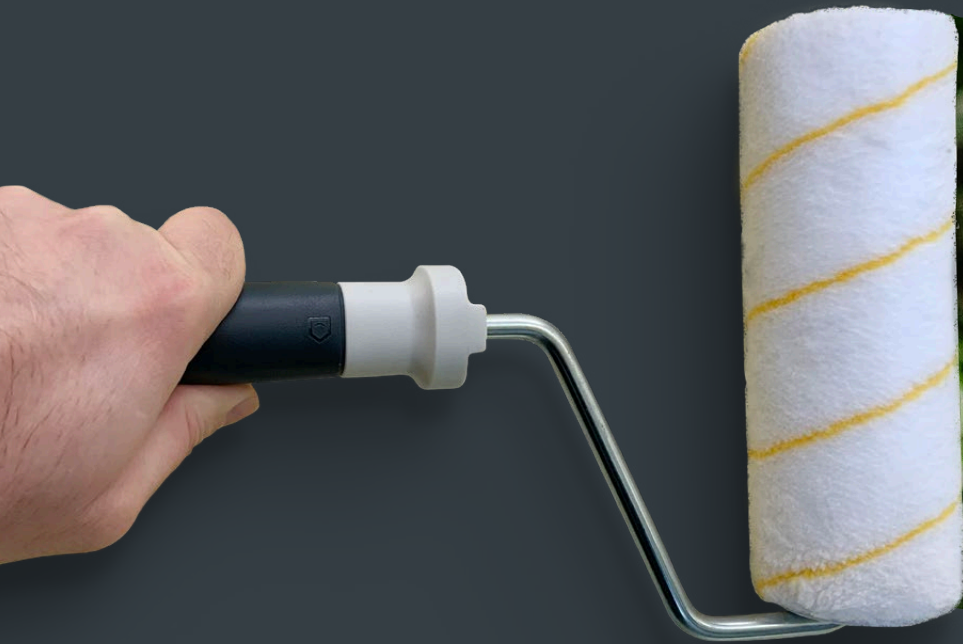


Modern Slavery Act

Transparency Statement
2024/25

Kingfisher



We continue to ensure respect for human rights is consistently applied throughout our business. We are working with colleagues, our supply chains, and relevant partners to ensure we identify and assess risk, apply due diligence, and take any necessary steps to deliver our human rights and modern slavery agenda.

Our commitment to address modern slavery risks starts at Board level and is embedded into key business processes.

About the statement

This statement has been published in accordance with the UK Modern Slavery Act 2015, which requires businesses to disclose the steps they are taking to tackle slavery, servitude and forced or compulsory labour and human trafficking (together known as modern slavery). It covers the six areas outlined in the Home Office guidance:

- Organisation structure and supply chains.
- Policies in relation to slavery and human trafficking.
- Risk assessment and management.
- Due diligence processes.
- Key Performance Indicators to measure the effectiveness of steps being taken.
- Training on modern slavery and trafficking.

This statement sets out the steps taken by Kingfisher plc and all its subsidiary undertakings inclusive of its UK operating companies and its UK retail banners, to prevent modern slavery in its own business and supply chain, for financial year ending 31 January 2025.¹

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¹ Data on ethical compliance audits (goods for resale and goods not for resale) are based on a 12-month calendar year ending 31 December 2024.

Our company structure

Who we are

Kingfisher is an international company with over 1,900 stores in eight countries across Europe. We offer home improvement products and services to consumers and trade professionals through our stores and e-commerce channels.

We are committed to striving to lead our industry in Responsible Business practices and energy efficiency, building on our strong environmental, social and governance (ESG) credentials.

Responsible Business is one of eight pillars that make up our strategic plan – ‘Powered by Kingfisher’ – which aims to maximise the benefits of combining our distinct retail banners with the scale, strength and expertise of the Kingfisher Group.

Banners, partnerships and marketplaces

Kingfisher operates in eight countries across Europe under retail banners including B&Q, Castorama, Brico Dépôt, Screwfix, TradePoint and Koçtaş. We now have online marketplaces and digital hub stores available within all our retail banners to better serve our customers, however they choose to shop.

**Better Homes. Better Lives.
For Everyone.**

**At Kingfisher, we believe
a better world starts with
better homes and we strive
to help make that happen.**



Over 76,000¹
colleagues



Operations in
8 countries



Over 1,900
stores



£12.78 billion
of sales



13,800+²
supplier partners



All figures on this page relate to the year ended 31 January 2025.

¹ Turkey joint venture included. Total, not full-time equivalent.

² Total number of suppliers represents both Goods For Resale (GFR) and Goods Not For Resale (GNFR).

³ Kingfisher has 'Centres of Excellence' in supply chain, trade, compact stores, customer services, data, technology and e-commerce, and marketplace.

3 International Brands are classified as products that carry a widely recognised brand in our markets and generally operate across more than one market. Selected branded suppliers that meet the internal eligibility criteria for classification as an 'International Branded Supplier' are invited by Kingfisher to submit a signed letter of conformance.

Governance

Responsibility for modern slavery and ethical sourcing is established at Board, Group and banner level.

Board and executive level

The Kingfisher plc **Board** has overall responsibility and accountability for the effective management of our modern slavery risks.

Our **Responsible Business Committee**, a committee of the Board and chaired by a non-executive director, supports and oversees the delivery of the Responsible Business strategy.

Group level

Our central **Responsible Business team**, led by our Director of Responsible Business, is responsible for developing our strategy and reporting on Responsible Business issues, including human rights. We have a dedicated Human Rights Manager who reports to our Head of Environment and Human Rights, and a Sustainability Manager who has a focus on Goods Not For Resale (GNFR). Our Human Rights Manager chairs the Human Rights and Modern Slavery Working Group.

Our **Group Offer and Sourcing (O&S) teams** drive the development and sourcing of OEB products and manage global

relationships with our top International Brand suppliers. The teams are based at global sourcing offices in Asia and Europe.

Within O&S we have a dedicated **Ethical Compliance team**, responsible for implementing our ethical sourcing approach with OEB suppliers and their production sites as well as suppliers who produce both OEB and local branded goods. The team also acts as a Centre of Excellence (CofE) supporting our retail banners with any ethical issues as well as being responsible for developing and maintaining SOP (Standard Operating Procedure) and work instructions so that banners and the O&S team work to a uniform approach.

Group Procurement is responsible for managing over £2.3 billion spend each year by Kingfisher and its banners on GNFR that supports business operations. Our GNFR Sustainability Manager works with the Group Procurement's Strategy and Operations team (acting as a Centre of Excellence) to implement our ethical sourcing approach for GNFR.

Our **Group Compliance team** manages the colleague and vendor whistleblowing hotline as well as the pre-contractual Vendor Engagement Assessment for GNFR vendors and integrity assessment for GFR vendors. The Group Compliance team is also in charge of the Compliance training.

Banner level

Our retail banners develop the category strategies and product ranges for their own markets, to reflect local preferences, and source non-OEB products. Local Sustainability teams (supported by the O&S Ethical Compliance team) apply and implement our Group ethical sourcing policies and ethical compliance programme across production sites and suppliers.



Key committees and networks



Committees

Responsible Business Committee (RBC)

Purpose: A committee of the Board. Supports and oversees the delivery of our Group level Responsible Business strategy (including human rights), setting our ambition and monitoring progress. The Chair of the RBC reports on the Committee's activities to the plc Board at least twice a year.

Timing: Met three times this year

Chair: Non-Executive Director (NED) Sophie Gasperment

Members: Chief Executive Officer, a second NED, the Chief Offer and Sourcing Officer, the Chief People Officer, and the CEO of Screwfix.

Audit Committee

Purpose: A committee of the Board. Oversees the integrity of our financial and narrative reporting, the effectiveness of our internal controls, risk management and audit, as well as reviewing compliance matters.

Timing: Meets four times a year

Chair: NED Jeff Carr

Members: The Audit Committee is comprised solely of independent non-executive directors. More detailed information on the work of the Audit Committee is set out in the Kingfisher plc [2024/25 Annual Report and Accounts](#).

Group Ethics and Compliance Committee (GECC)

Purpose: Assisting the Board in fulfilling its oversight responsibilities for the Kingfisher Compliance Framework. The committee ensures that the Kingfisher Code of Conduct, related Group Policies and Standards, as well as those which set out ethical standards, are followed, and ensures that the Group approach to ethics and compliance are adequate and effective. This includes approving compliance training and reviewing the outcomes of investigations.

Timing: Meets quarterly

Chair: Chief Financial Officer

Members: Chief Executive Officer, Chief Financial Officer, Chief People Officer, General Counsel, the Internal Audit and Risk Director, and the Group Compliance Officer.

Local Ethics and Compliance Committees

Purpose: Local Ethics and Compliance Committees and local compliance officers within each banner, ensure ethical and compliance standards are upheld at a local level. These committees, along with local compliance officers, play a key role in overseeing Kingfisher's ethics and compliance programmes, particularly in relation to whistleblowing and ensuring compliance with local regulations.



Working Groups

Human Rights and Modern Slavery Working Group

Purpose: To monitor activities across the Group related to human rights and our approach to tackling modern slavery.

Timing: The Human Rights Working Group was convened for a dedicated workshop to help shape the human rights and ethical trade elements of our Responsible Business strategy. Members also participated in the stakeholder consultation process for the Corporate Sustainability Due Diligence Directive (CSDDD) readiness assessment, supporting the evaluation of Kingfisher's preparedness for the upcoming EU legislation.

Chair: Human Rights Manager

Members: Include Responsible Business, O&S (GFR), Sustainability Manager (Logistics and GNFR), Group Procurement, Supply & Logistics, Legal Compliance, Community functions and representatives from our retail banners. Colleagues from our Internal Audit/Risk, People, GNFR and Inclusion and Diversity functions also attend to challenge and hold the working group to account for its work on human rights and modern slavery.

Ethical Working Group

Purpose: To share best practices and discuss operational issues in relation to ethical sourcing and other sustainability topics.

Timing: Meets every 4–6 weeks

Attendees: Sustainability representatives from O&S, sourcing offices and banners as well as the Human Rights Manager.



Networks

Responsible Business Network

Purpose: To share learnings and best practices, celebrate achievements and give updates on the four pillars of the Responsible Business strategy. From a human rights perspective, the network is used to raise awareness of identifying modern slavery risk. For example, this year the network organised a dedicated awareness session, led by the charity Hestia, to highlight the work they do to support survivors of modern slavery. For more information see 'Employee training and awareness building' on page 22.

Timing: Met three times in 2024/25

Chair: ESG Engagement Manager

Attendees: Colleagues from O&S, Sustainability, Procurement, Logistics, Brand, Investor Relations, Customer, Marketing and banners.

Business-Critical Surgery

Purpose: To discuss remediation and progress on any business-critical issues (the most serious breach of standards) found within our product supply chains. Also to share best practices, discuss approaches, and provide updates on ongoing cases. All activities are recorded in our Business-Critical Tracker.

Timing: Meets every 6–8 weeks

Attendees: Sustainability leads from O&S, banners and Responsible Business.

Policies

Our policy framework outlines the modern slavery and human rights rules and standards within our business and expectations for our suppliers and partners.

These policies, which have been approved by members of our Group Executive and apply to all suppliers (GFR and GNFR), are reviewed annually and updated where necessary. The Group Executive comprises the CEO and his direct reports, including the CFO, banner CEOs, and certain functional leads. This group meets monthly to support and advise our CEO to develop and implement the strategic direction of the Group and its constituent businesses, to make and implement operational decisions, and, where appropriate, to make Board recommendations.

Collectively, they help us implement our commitment to human rights and include:

Code of Conduct

The Code of Conduct applies to all Kingfisher colleagues, contractors and suppliers. It sets out personal and shared responsibilities for meeting high ethical standards, including a duty to report any potential breaches of the Code, and includes a section on modern slavery which states our commitment to human rights and ethical sourcing. It forms an integral

part of our contracts, and we communicate it to suppliers via channels such as the Supplier Manual and Supplier Conferences.

Human Rights Policy

This is our key policy on modern slavery, which states our commitment to respect human rights, in line with international agreements and guidelines including: the United Nations (UN) Guiding Principles on Business and Human Rights; the International Bill of Human Rights (which includes the Universal Declaration of Human Rights); the UN Global Compact; the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; the Children's Rights and Business Principles; and UN conventions on the elimination of discrimination.

The Policy also states our commitment to implement due diligence procedures to avoid infringing on the rights of others and includes a detailed section on ethical sourcing and ethical audits (see 'Working with suppliers' on page 10).

Supply Chain Workplace Standards

These set out minimum standards on labour practices and environmental practices that suppliers must abide by and which we check through our ethical audits (see 'Working with suppliers' on page 10).

They prohibit slavery and child labour and set expectations in areas such as health and safety, working hours and wages, and freedom of association.

These standards reflect the requirements of the Ethical Trading Initiative (ETI) Base Code and International Labour Organization (ILO) fundamental conventions on worker rights and align with the audit standards set by Sedex and amfori BSCI.

Whistleblowing Policy

This states our commitment to provide a channel for colleagues and third parties, including suppliers, to raise any concerns securely, confidentially and without fear of retaliation including in relation to human rights and modern slavery (see 'Whistleblowing and escalation' on page 21).

You can read our Code of Conduct at kingfisher.com/codeofconduct and our Responsible Business policies at kingfisher.com/ResponsibleBusinessPolicies.



Risk assessment

Given the size of our global supply chain, we adopt a risk-based approach, prioritising the most significant human rights and modern slavery risks.

Our ongoing due diligence processes continually mitigate and address human rights risks within our business and supply chains, and we collaborate with suppliers, peers, industry bodies, non-governmental organisations (NGOs) and governments to raise standards.

Across the Group

To focus our activities, we prioritise and frequently review the salient human rights risks identified as part of the Saliency Assessment.

Saliency Assessment

We continue to utilise the Saliency Assessment conducted in 2020, as the identified salient issues remain relevant to our business, operations and global supply chains. The assessment involved a detailed risk and gap analysis to understand where salient risks are most likely to occur within our business and supply chain. It was informed by engagement with nearly 100 colleagues across the organisation, findings from our materiality assessment (which examined 25 key raw materials used in our products), external human

rights frameworks (such as the UN Guiding Principles on Business and Human Rights), external risk assessment tools, and ongoing engagement with civil society and industry organisations including Slave-Free Alliance, ELEVATE and allianceHR.

These findings confirmed that our most significant human rights risks are present within our supply chains, particularly at the raw material extraction and product manufacturing stages. These are:



Modern slavery



Child/underage labour



**Freedom of association/
collective bargaining**



Health and safety



Wages/working hours



Land rights



Depletion of natural resources



Impact of climate change



Air, water and land pollution



Discrimination

Human Rights Gap Analysis

In 2023, as part of our ongoing partnership with Slave-Free Alliance (SFA), we requested them to conduct an independent Human Rights Gap Analysis, identifying good practices and areas for improvement across our operations and supply chain. This review assessed our approach to modern slavery and labour exploitation risks, ensuring alignment with relevant legislation and industry best practices.

Slave-Free Alliance engaged with key internal stakeholders, including the Human Rights and Modern Slavery Working Group, alongside teams from Responsible Business, O&S (GFR), Group Procurement (GNFR), Logistics, Legal Compliance, Internal Audit/Risk, People/HR, Inclusion and Diversity, and banner Sustainability leads.

This aligns with the previous Saliency Assessment findings, confirming those risks remain relevant.

The gap analysis process also helped us identify vulnerable people groups that may be found within our supply chains and operations: indigenous communities, migrant workers, minority ethnic groups, agency and temp workers, children and young workers, female workers and remote/isolated workers. Additionally, the salient human rights issues previously identified in our Saliency Assessment were confirmed as still relevant key risk areas within our supply chains.

To address the findings from the gap analysis we implemented the following updates:

- **Human Rights Policy update:** We revised our Human Rights Policy to clarify our expectations regarding ethical standards for third-party marketplace suppliers. These requirements are now embedded within the marketplace Terms & Conditions, which outline the minimum standards all sellers must meet to operate on our platform.
- **Legislative preparedness:** We commenced preparations for upcoming European legislation, including the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD).

- **Internal alignment and implementation:** We strengthened collaboration between Group and retail banners. This included issuing detailed work instructions from Group to banners, outlining what policy compliance looks like in practice and how it should be applied operationally.

Ongoing approach

We continue to integrate gap analysis recommendations into our approach to modern slavery, ensuring we prioritise vulnerable groups and implement targeted policies, programmes and activities to mitigate risks. The Saliency Assessment remains a relevant tool in our ongoing approach to supplier engagement and our 'beyond audit' programmes, which aim to address wider issues and root causes in our supply chain.

The gap analysis process also helped us to identify vulnerable people groups that may be found within our supply chains and operations.

Indigenous Communities

Migrant Workers

Minority Ethnic Groups

Agency and Temp Workers

Children and Young Workers

Female Workers

Remote/Isolated Workers



'Beyond audit' refers to the work we do outside of formal ethical audits and assessments to address the underlying causes of human rights risks. This includes initiatives that directly support workers, supplier training on human rights and labour standards, and partnerships with expert organisations such as NGOs.

For more on our beyond audit activities, please refer to page 19, 'Going beyond audit'. Further details on our sourcing risk assessment approach can be found in 'Working with suppliers' on page 10.

Preparing for the future

In preparation for the upcoming EU Corporate Sustainability Due Diligence Directive (CSDDD), which requires businesses to identify, prevent and mitigate human rights and environmental risks across their value chains, we conducted an initial readiness assessment with key internal stakeholders. This assessment benchmarked our current approach against the directive's proposed requirements, evaluating relevant policies, processes and potential compliance gaps.

As the readiness assessment was completed prior to the publication of the EU legislative omnibus, we are now reviewing and refining our approach to reflect the updated requirements. With the CSDDD scope now refocused on direct suppliers and the compliance deadline

postponed to 2028, we are reviewing and refining our approach to align with the revised scope and obligations.

While the original assessment findings will continue to inform our roadmap and implementation planning, these will be updated to reflect the revised legislative framework and the new compliance timeline.

Managing risk within our operations and supply chains

Risk assessment for GFR

We use several risk assessment tools to identify, prioritise and mitigate risk within our product supply chains, particularly in the highest-risk countries, sectors and locations. Our assessment tools include:

- **Dow Jones Risk Centre.** Kingfisher screens suppliers and factories using our Anti-Bribery and Corruption Process. We screen vendor and factory details through the Dow Jones Risk Centre.
- **Collaborative compliance platforms.** Sedex, amfori BSCI and EcoVadis allow us to access data on inherent risks related to country and industry sectors. The Sedex Self-Assessment Questionnaire (SAQ) enables us to risk assess suppliers and production sites, dependent on their responses.
- **Our ethical audit risk matrix.** Updated annually, this enables us to identify the high-risk product areas and countries

in our GFR supply chain. The risk matrix considers various factors, including countries and territories with significant human rights risks due to geopolitical issues, such as global conflicts. It also evaluates product categories with increased risks of labour exploitation, such as reliance on seasonal or migrant workers, poor working conditions, or low wages.

- **Third-party ethical audit reports.** These provide information on the operations within the production site, including any issues found by the auditor.

See 'Working with suppliers' on page 10 for more details on the ongoing audit programme and due diligence approach.

Risk assessment for GNFR

In 2024, a Goods Not for Resale (GNFR) risk matrix was developed in partnership with Slave-Free Alliance (SFA). This tool is being used to review our current GNFR programme and to strengthen our risk management approach. The matrix identified several high-risk categories, including logistics, warehousing and cleaning services.

In the first half of 2025, we will pilot a series of ethical audits focusing on suppliers identified as high risk. These audits will assess working conditions and labour standards. The outcomes of this trial will inform the future direction of our GNFR ethical compliance approach.



To monitor ongoing risks, we use:

- **Vendor Engagement Assessment (VEA)**, used to conduct due diligence checks on new suppliers (with whom we have an estimated spend of over £5,000 or equivalent in local currency) and existing suppliers where there have been changes in the terms and conditions of their engagement. In 2024 Screwfix rolled out a new tool that helps automate and simplify the VEA process. This time-saving tool will now be used by other banners and in other parts of the business beyond GNFR.
- **EcoVadis Sustainability Assessment Platform**, which allows us to collect information on our GNFR suppliers' sustainability and ethical processes. We request that suppliers with an annual spend greater than £75,000 complete a regular EcoVadis Sustainability Assessment, in addition to the VEA process.
- **GNFR risk matrix**, which we are using to inform our risk approach.

See '[Working with suppliers, GNFR](#)' page 17 for more details on our supplier assessment programme and due diligence approach.

Risk assessment for our operations

We have identified a low risk of modern slavery occurring in our business operations and among our direct employees, based on our human rights Saliency Assessment and our work with Slave-Free Alliance.

Colleagues working in our offices and stores are protected by strong local employment laws as well as our own employment policies and practices.

Risks are higher for workers providing contracted services such as construction, cleaning, security and logistics, particularly where labour providers are used. These risks are managed through our ethical sourcing programme for GNFR suppliers (see page 17).

Risk assessment and due diligence for new acquisitions, partnerships and third-party suppliers

We expect all our digital marketplace, service providers, franchise, wholesale and joint venture partners to share our commitment to human rights and to uphold our standards. Our Human Rights Policy clarifies our position regarding the ethical requirements our third-party marketplace suppliers must comply with. This is embedded in the marketplace Terms & Conditions, which detail the minimum requirements for all sellers on the platform. This includes a modern slavery clause, requiring all sellers/suppliers to report any identified cases of modern slavery to Kingfisher. We also reserve the right to audit and investigate any potential cases. Specifically, this refers to our existing marketplaces in the UK, France, Poland and Iberia (e-commerce platforms where third-party suppliers can

sell their products). It also covers Koçtaş, Kingfisher's 50% joint venture in Turkey. The same commitment is expected from Screwfix Spares.

When we acquire new businesses or enter into new partnerships, we carry out due diligence and embed our Code of Conduct and our Human Rights and Responsible Business policies into the partnership agreements.

We continue to work in collaboration with our third-party partnerships and suppliers, supporting them in adopting our policies and processes. Due to their business models being so different from ours, this forms part of our ongoing due diligence approach.

Country risk assessment, global conflicts

We continuously monitor and assess risk on a country-by-country basis, taking into account any ongoing global conflicts. This informs our decisions on sourcing and whether we need to adapt our ethical compliance audit approach.



Working with suppliers

GFR Goods For Resale



The products we buy to sell to our customers, whether they’re OEB¹ or non-OEB², are sourced from over 2,600 suppliers across 56 countries.

To ensure these suppliers adhere to our compliance standards we continue to tighten our internal policies and requirements. For example:

- Each banner has permanent resources responsible for onboarding and verifying suppliers. Regular meetings take place with the banners to improve the quality of existing data.
- The Group has created thorough guidance documents, to support implementation of policy compliance.
- A film and factsheet, detailing our compliance requirements, are provided to new and existing suppliers. Both are available in the relevant market languages.
- We continue to map the growers of our largest OEB suppliers for horticulture and have addressed all critical³ and high-risk findings with the growers.

- We continue to use the Sedex Self-Assessment Questionnaire (SAQ), a set of questions for businesses to complete about their management systems, policies and working conditions. We review and ask further questions where there may be concerns about their business practices.

Our ethical audit programme scope and due diligence process is focused on directly sourced products, including **Tier 1** and **Tier 2** suppliers.

Tier 1
OEB, non-OEB and International Brand⁴ suppliers with whom we have a direct business relationship

Tier 2
OEB and non-OEB production sites

Beyond Tier 2
E.g. growers, component/raw material providers

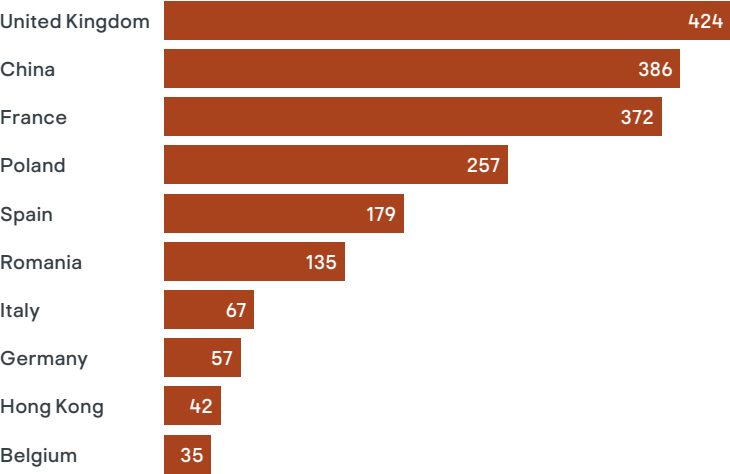
Tier 1: OEB and non-OEB suppliers

OEB suppliers, as well as non-OEB suppliers above a spend threshold of £50,000, must disclose all the production sites supplying us with finished goods. Suppliers share this information with us via collaborative social audit platforms including Sedex and amfori BSCI. For non-OEB suppliers below the spend threshold, we follow a letter of conformity approach. An exception is made for those suppliers who, despite being below the threshold, source from production sites identified as high risk by our ethical audit risk matrix. In such cases, the production sites are required to provide a valid ethical audit.

This is an ongoing process, and we continue to work with our supplier partners to ensure their production site information remains in alignment with our Responsible Business policies and our ongoing commitment to improving transparency. 82% of suppliers are compliant with policy requirements, meaning they have an active membership to one of our nominated audit platforms: Sedex or amfori BSCI, or an EcoVadis certificate scoring over 50, dated within the past 12 months. This is an increase from 71% in 2023. For OEB suppliers, 95% are compliant, an increase from 92% in 2023. Compliance with policy has increased due to the increased awareness of our suppliers to our programme, following

Top 10 supplier countries

Number of suppliers⁵



In 2024:

2,666 of our suppliers were OEB and non-OEB suppliers.

82% of suppliers were compliant with our policy requirement of holding an active membership with one of our nominated ethical audit platforms vs 71% in 2023.

95% of OEB suppliers were compliant with our policies vs 92% in 2023.

79% of non-OEB suppliers were compliant with our policies vs 67% in 2023.

1 Own Exclusive Brand (OEB) – refers to Kingfisher’s own brands. Designed, produced and/or sold by Kingfisher. Sourced by Group Offer and Sourcing (O&S) and sold across banners and through wholesale, joint venture and franchise partners.

2 Non-Own Exclusive Brand (Non-OEB) – refers to products that carry the supplier’s name but are not widely recognised brands in our markets. Local and national branded products supplied by suppliers that are sourced by banners or Group Offer and Sourcing (O&S) and may not be exclusive to Kingfisher.

3 ‘Critical’ refers to a systemic, deliberate, or severe breach of the audit code or local law which represents a danger to workers or others, or which denies a basic human right, or an attempt to pervert the course of the audit. ‘Major’ relates to a systemic breach of the audit code or local law that could present a danger to workers or violate a human right.

4 International Brand suppliers are not included in our disclosure and audit data.

5 This is the number of suppliers registered on the Sedex platform. The total number of suppliers is likely to be higher.

the creation of a short film and factsheet. Our aim is to consistently achieve above 95% compliance with policy from our OEB suppliers.

Our central Sustainability team and banner level sustainability personnel share data on supplier and production site ethical performance through our Vendor Index and Site Index. These databases provide clear information on the suppliers and production sites disclosed, which banners they supply, and their alignment with our Ethical Sourcing Vendor Guidelines.

Tier 1: International Brand and third-party suppliers

Suppliers are considered International Brands if: they can confirm they have an ethical compliance programme in place, they continually carry out due diligence on their supply chain (including a third-party audit programme), and they monitor and mitigate any non-conformances found. They also need to declare they have someone in their organisation responsible for this area and must agree to have their programme assessed against Kingfisher's programme requirements as part of our random spot checks. International Brand suppliers, and our joint venture, franchise, wholesale and marketplace partners, must commit to implementing their own ethical compliance programmes in accordance with the law and our company policies.

Any International Brand suppliers that fail to demonstrate policy compliance are removed from our supplier list, while those deemed to have insufficient ethical sourcing programmes must be included in Kingfisher's own disclosure and ethical audit programme.

International Brand suppliers with modern slavery breaches have their International Brand status removed while they are investigated.

i This year we have been working closely with two suppliers who had previously been denied International Brand status due to their ethical compliance programme not meeting our standards. We supported them with regular meetings, agreeing key objectives such as mapping all products to production sites, risk assessing production sites and completing acceptable ethical audits.

Both suppliers have now satisfied our requirements and are being supported towards achieving International Brand status. By aligning their audit requirements with ours, we have reduced potential audit duplication for production sites.



Tier 2: OEB and non-OEB
production sites

Through our suppliers, we work with over 5,500 known production sites, across 73 countries, to manufacture our goods for resale (both OEB and non-OEB products).¹ The increase in supply chain visibility is a result of the collaborative efforts between the Group O&S team and the enhanced resources allocated within the banners. This includes training workshops and the creation of work instructions to help the banners manage compliance with policies for their production sites and suppliers. Additionally, the O&S team manages and supports Hybrid Suppliers, who supply both OEB and non-OEB products. Refer to the ‘Supplier engagement’ section on page 20 for more information on our ongoing supplier training and capacity building.

Our policies require suppliers to disclose their production sites. These sites are categorised as either low or high risk (see page 14), with information regarding these sites shared on an accepted ethical compliance platform. High-risk sites must share a valid ethical audit completed in the previous two years for review.

73% of declared production sites comply with our disclosure requirements vs 85% in 2023. The slight decline is partly due to changes in how data was captured in 2023, following the launch of a new Self-Assessment Questionnaire (SAQ).

The Sedex SAQ enables us to risk assess suppliers and production sites based on their responses; however, the updated format limited our ability to track full completion rates. As a result, the 2023 data is not directly comparable with 2024 or previous years.

We continue to work with our suppliers to disclose their production site information, which is in alignment with our policies and our ongoing commitment to improving transparency.

i

In 2024, we had:

5,551 declared production sites.

73% of declared production sites complying with our disclosure requirements vs 85%² in 2023.

Over 948,000 people working at our declared production sites.³

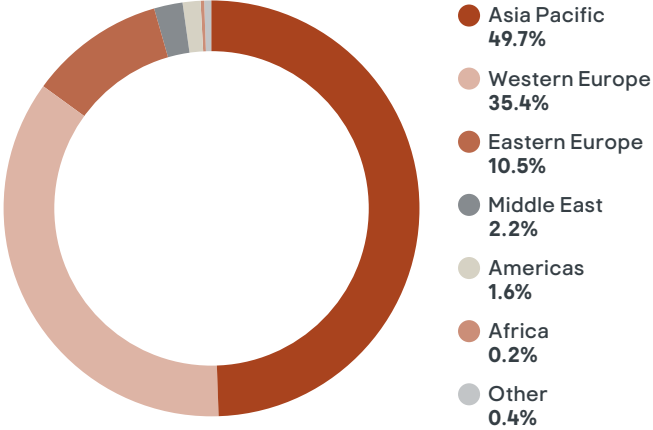
40% female workers, 60% male workers and fewer than 1% stating ‘Other’.

Tier 2: Production site due
diligence

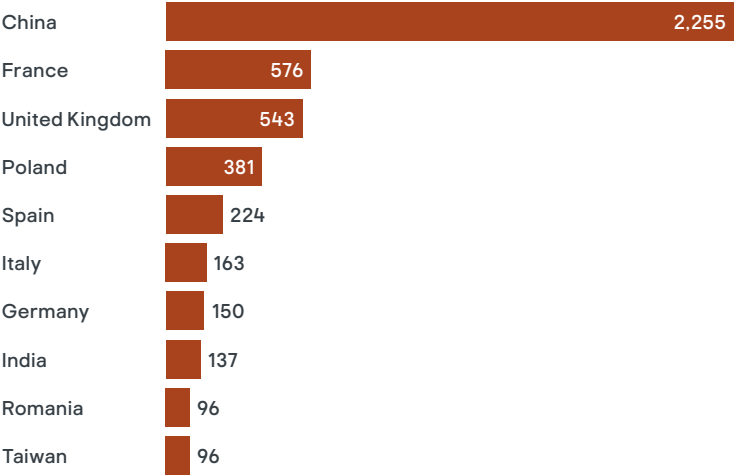
Our supplier engagement and ethical audit programmes are designed to improve ethical standards in our supply chain.

Our due diligence for modern slavery issues also includes ethical risk assessment processes (page 7). In addition, we go beyond basic due diligence through supplier training and engagement (page 20), and collaboration with human rights experts and others in our sector (page 23).

Sourcing by region
Number of production sites



Top 10 supplier countries
Number of production sites



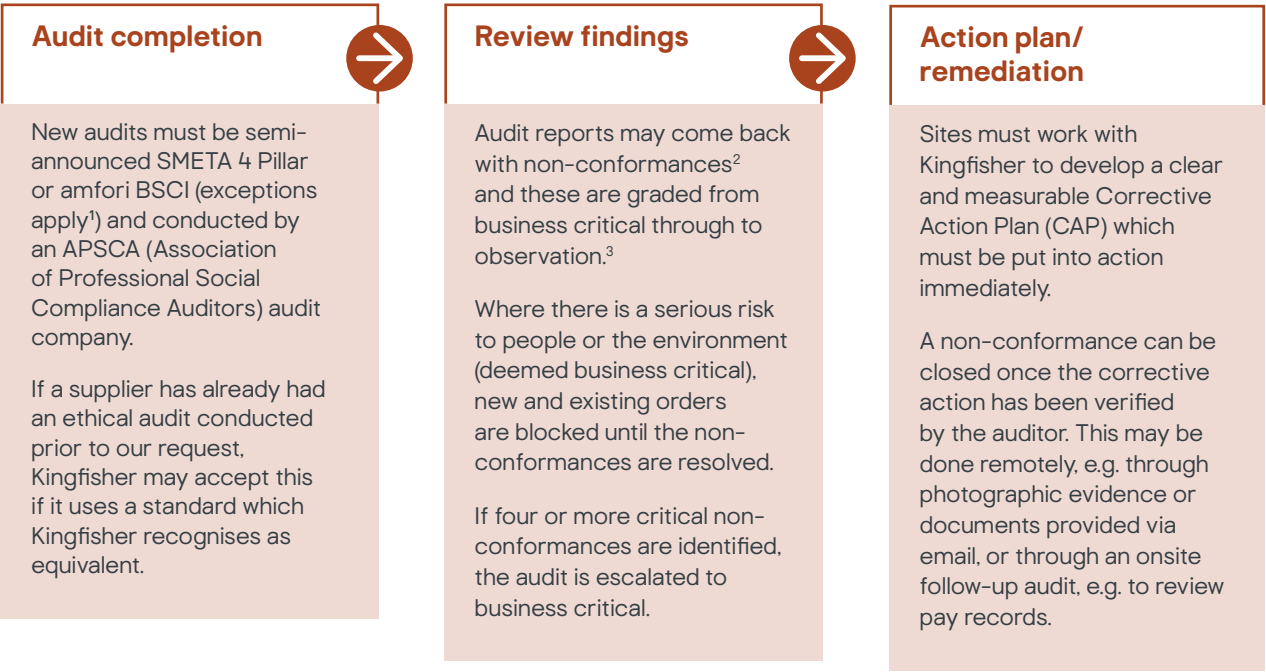
1 This is the number of production sites disclosed to us via Sedex or other platforms. The total number of production sites is likely to be higher.
2 In 2023, the launch of a new SAQ meant that completion of the SAQ to 100% could not be tracked, therefore the 2023 reported data is not comparable with 2024 and other years.
3 This refers to production sites linked to Kingfisher on Sedex. The actual number of workers at declared production sites is higher.

Ethical compliance process

Our ethical compliance process is the same for both sites producing OEB or non-OEB products above a spend threshold of £50,000.



Ethical compliance audit requirements
(for all sites categorised as high risk)



1 If a supplier has an existing ethical audit from the following list of audit standards it may be accepted: SA8000 – Social Accountability 8000, FLA – Fair Labour Association, ICTI – International Council for Toy Industries, Intertek Workplace Conditions Assessment (WCA) Report, MPS-SQ (must have the SQ component), RBA – Responsible Business Alliance, Global Gap GRASP.

2 A non-conformance refers to not meeting specified standards or expectations, often detected by internal audits or inspections. A non-compliance is a confirmed breach of a local, national, or international law or the ETI (Ethical Trade Initiative) base code.

3 'Business critical' applies to situations that pose the most serious risk to people and our planet, like child labour and circumstances where workers or the environment are in imminent danger. 'Critical' refers to a systemic, deliberate, or severe breach of the audit code or local law which represents a danger to workers or others, or which denies a basic human right, or an attempt to pervert the course of the audit. 'Major' relates to a systemic breach of the audit code or local law that could present a danger to workers or violate a human right. 'Minor' refers to an isolated breach of the audit code or local law which represents low risk to workers or a policy issue. 'Observation' is a practice which does not break the law or standard but, if not corrected, could lead to a non-conformance.

Roll-out and effectiveness of measures

Ethical audits review production site performance and identify any instances of non-conformance with our standards relating to labour practices and human rights, health and safety, business ethics and environmental performance.

i

Total number of declared production sites identified as high risk **3,080**

Total number of audited high-risk production sites in the past two calendar years **2,619**

The auditor will produce an audit report, including a Corrective Action Plan, in which they will identify any non-conformances, stipulate what needs to be done to address them, and recommend a timescale for closing them out (which will vary according to the type of non-conformance). Sites are required to implement any corrective actions accordingly and report progress to their auditor.

We work with suppliers and production sites to address and close the audit non-conformances, prioritising the most critical issues. Once complete, the site should verify their corrective actions and improvements with the auditor via a desktop review and/or a follow-up audit.

In 2024, we increased the number of audits conducted at high-risk production sites, a direct result of the increased visibility.¹ The additional resources within the banners have enabled us to review and record these audit results effectively, and engage with suppliers. The result is more high-risk production sites undergoing an audit, significantly improving our supply chain visibility and transparency.

There has been a focus on horticultural vendors. Kingfisher trialled a new process with our largest OEB horticultural vendors in 2024, requesting a list of growers to give us visibility of their ethical compliance status. Specialist ethical audit methods GlobalGAP and MPS-SQ are accepted for horticulture products. This has been added into policy for 2025.

Remediation

We track audit findings and progress on remediation to monitor the effectiveness of our ethical compliance programme.

Within the last calendar year, we have worked with our supplier partners and production sites to close 47% of the identified non-conformances. This closure rate reflects the ongoing nature of our ethical audit programme. Each audit may identify new issues or non-conformances, even at facilities that have been previously audited. This process is central to driving continuous improvement in working conditions across our global supply chains. Additionally, as new

suppliers are onboarded, audits conducted as part of the approval process often reveal new findings that require resolution.

We continue to monitor and work in collaboration with production sites to address outstanding issues, through our ongoing audit programme.

i Top five non-conformances by category (GFR)

This table shows the top five non-conformances by category for all SMETA ethical audits carried out in the past two years. The majority of non-conformances relate to health and safety. These typically include issues such as missing fire extinguishers or obstructed fire exits and are commonly observed across global supply chains. In many cases, these can be addressed through corrective actions and routine follow-up. In contrast, issues related to wages and excessive working hours can indicate a more systemic issue that may require a longer-term and more collaborative remediation approach. Other common non-conformances include management systems and environmental practices.

Non-conformances	Number
Working conditions are safe and hygienic	6,196
Working hours are not excessive	1,134
Legal wages are paid	739
Environment ²	514
Management systems ³	371

We also track non-conformances under the heading 'employment is freely chosen', of which there were 86 in 2024. Findings under this heading range from lack of policies through to instances of forced, bonded or involuntary labour and worker recruitment fees. Refer to 'Addressing business-critical issues' for more information regarding our approach.

Note: data covers production sites disclosed to us that are registered and linked to Kingfisher on Sedex with active purchases for 2024.

1 Kingfisher has a list of products considered high risk, which evolves year on year. In 2024, a clarification was added on textile products; no new products were incorporated for 2024.
2 Covers issues relating to Waste Management, Environmental Permits, Energy Usage, Chemical Usage/Disposal, Air Emissions, Reforestation, Conservation and Biodiversity.
3 A management system is defined as a comprehensive framework comprising of processes, policies, procedures and tools that are strategically designed and implemented within a business to plan, organise, execute, monitor and continuously improve its activities.



Addressing business-critical issues



Production sites are risk-rated as 'business critical' if auditors uncover one or more business-critical non-conformances, or four or more 'critical' non-conformances. Business-critical non-conformances represent the most serious breach of standards. If there are any business-critical non-conformances identified from the audit, the supplier or production site is required to take decisive and swift action. We will not place new orders with existing sites, or start working with new sites, that have business-critical non-conformances, and we will suspend new orders until these are resolved. As a last resort, we

will cease to trade with production sites or suppliers if they don't work with us to address business-critical issues.

When a business-critical issue is identified, we require suppliers to act immediately to ensure the welfare of workers. We take the following steps:

– **Escalation and notification:** A member of our Ethical Compliance team will ensure the correct people are notified internally and externally. Our escalation and notification process is reviewed annually.

- **Remediation:** Our Responsible Sourcing team works with key internal stakeholders, as well as the supplier and production site, to manage and address the issues identified through a Corrective Action Plan. We agree on a timescale for implementation.
- **Engagement:** Depending on the nature of the issue, a member of our O&S team or Quality team may visit the production site to help with the remediation plan. We engage with the production site throughout the process and work to ensure the wellbeing of workers is prioritised.
- **Close-out:** We require third-party confirmation, via a follow-up ethical compliance audit or desktop review, that the issues identified have been resolved. We use a tracker to monitor suppliers identified as having business-critical non-conformances. Any production sites with business-critical non-conformances are recorded as 'open' until an ethical compliance audit confirms the issues have been addressed and the case is then 'closed'.
- **Follow-up:** We continue to work with and monitor the production site post-incident. We carry out regular follow-up audits to ensure production sites comply with our standards.

Beyond Tier 2: Indirect suppliers

Our extended supply chain includes many more indirect suppliers, including suppliers of raw materials and component parts used in the products we buy and sell.

We continue to map our indirect supply chain for OEB products and are working on several projects to improve standards, prioritising indirect supply chains according to our saliency and risk assessments. See ['Going beyond audit: addressing our salient human rights issues'](#) on page 19 for examples.

“We engage with the production site throughout the process and work to ensure the wellbeing of workers is prioritised.”

1 During 2024, we ceased working with 20 business-critical production sites for various reasons, including the completion of business contracts and changes in sourcing requirements. In two of these cases, we made the decision to stop trading with the sites as a last resort due to their failure to collaborate with us in remediating identified issues.

2 During the reporting period, 15 production sites identified as business critical had submitted appropriate corrective actions, while 11 were still in the process of addressing their critical issues. However, it should be noted that since then, some of these sites have improved from business critical.

Addressing cases of modern slavery

Any potential instances of modern slavery or child labour identified via ethical audits are considered business critical – the most serious breach of our standards. We take immediate action to resolve such cases, working with suppliers to ensure they understand our requirements, the corrective actions needed, and how to implement them.

Where adverse media checks have identified ongoing cases in the public domain, which has happened a few times, we follow up with suppliers.

The following examples are cases identified in 2024 through the ongoing ethical audit programme:



Right to work checks B&Q Ethical Sourcing team

A SMETA 4-pillar audit identified a critical risk at a B&Q supplier due to a failure to carry out Right To Work (RTW) checks on site. The supplier was notified, and a Corrective Action Plan was put in place.

The supplier's HR department set up an in-person meeting with the relevant agencies to agree new processes and verify documents. All RTW documents were checked for current workers, and a follow-up audit was booked.

In the meantime, the factory established a new process in which agencies send RTW documents prior to the worker's first day. These are then verified by the supplier's HR department as part of the day-one induction. The department has also created agency files for all RTWs and age verifications.

The follow-up confirmed appropriate actions had been taken and RTW documentation for agency workers was found to be in order. The issue was closed.



Holiday pay calculations B&Q Ethical Compliance team

A SMETA audit found that a supplier's agency worker contracts did not contain holiday pay calculation statements. This was raised as a critical issue.

The supplier was notified, and a Corrective Action Plan was completed. This involved them meeting with the agency to resolve the issue and agree a new process. The agency drafted a holiday pay statement which was approved by the supplier. This is now included in all contracts, added to internal noticeboards, and an explanation forms part of agency workers' induction. The supplier agreed to conduct audits on their labour providers every six months and will do noticeboard checks to confirm the holiday pay statement is being communicated to workers.

A follow-up audit confirmed the issue had been resolved.



Withholding identification documents and wages Far East Office O&S/Ethical Compliance team

A SMETA 4-pillar audit identified that a supplier was withholding the passports of 29 migrant workers and 50% of the workers' monthly salary. Our Responsible Sourcing team, in collaboration with the buying office and the supplier, implemented an improvement programme.

We worked closely with the supplier to ensure they understood our requirements, the necessary corrective actions, and how to implement them effectively. As a result, all passports and wages were returned to the migrant workers, and a proper procedure for handling passports was established. A follow-up audit, conducted by an independent third-party auditor, confirmed that the corrective actions had been satisfactorily implemented.



Withholding passports Far East Office O&S/Ethical Compliance team

During an ethical audit at a production site in Malaysia, it was discovered that the site management was keeping the passports of its migrant workers, who were a mixture of production workers and third-party security guards. These workers travelled from Nepal and Indonesia to work in Malaysia.

Upon reviewing the audit, the Kingfisher Ethical Compliance team met with the supplier and explained the severity of the non-conformances raised in the audit and agreed a Corrective Action Plan with the site.

The passports were returned to the workers, and all workers were given access to lockers to keep their personal documents in. After receiving their passports and attending a training session on safe keeping, they were asked to sign a form in their native language acknowledging they had received them. The site has now established a new monitoring process for its external security contractor to ensure the security guards have access to their passports. This was verified by a follow-up audit in December 2024.

GNFR Goods Not For Resale



These are the goods and services we use to operate our business, such as IT equipment, cleaning, security services, and logistics. They’re sourced from over 11,100 GNFR suppliers in our direct (Tier 1) supply chain.

In 2024, we saw a reduction from the 11,800 suppliers we worked with in 2023. While our supplier base does fluctuate year on year, this large shift in supplier numbers was the result of an internal consolidation exercise to ensure accurate reporting.

We continue to work with suppliers to ensure they comply with our policies. Progress has been made this year in a number of areas:

- Due to the changed global landscape, we have investigated and interrogated our risk within our GNFR supply chain with the help of Slave-Free Alliance, to create our GNFR ethical risk matrix. This piece of work has identified the number of low-, medium- and high-risk suppliers we have in each of our three purchase categories (in terms of spend) and will be used to inform our risk-based approach.
- Based on the risk matrix, we can focus more on our suppliers and target them

based on risk level and spend. This is a significant shift for us as it means we can be more focused in our approach. Next year we can put more of this into practice. We are also shifting our reporting internally to the number of compliant suppliers rather than spend.

- In 2024 we focused on engaging with stakeholders internally. For example, multiple teams, including Responsible Business, Legal Compliance and Finance, worked together to identify suppliers we actively want to work with from a risk-based perspective and to consider where we need more due diligence and where we can have a lighter touch approach. A planned outcome from this work is a preferred supplier list enabling informed decisions across the business.
- We are supporting our suppliers to improve their scores through our EcoVadis Improvement Programme. Responsible Business and Group Procurement teams now hold monthly meetings to discuss ongoing activities and workstreams, ensure alignment and support reporting.

All new GNFR suppliers must adhere to our Responsible Business policies as part of the contract negotiation process, and we embed human rights criteria into new

supplier contracts. The supplier assessment programme for GNFR has two phases, depending on our annual spend with the supplier.

Phase 1: Vendor Engagement Assessment (VEA)

Our Vendor Engagement Assessment (VEA) tool is used to conduct due diligence checks on GNFR suppliers. It must be completed before we buy any GNFR goods or services above £5,000 (or equivalent in local currency) for annual recurrent or one-off estimated spend with:

- A new supplier (VEA takes place during the tender process before the contract is signed).
- An existing supplier where the contract conditions have changed, for example due to a large change in scope of work, goods/ services to be provided in a different country, or a different estimated spend.

The VEA process screens for:

- Integrity (e.g. risks of payment of bribes by third parties representing Kingfisher).
- Data protection due diligence (e.g. processing of customer and colleague personal data by third parties).
- Types of service being provided for goods.
- Information security (e.g. protection of Kingfisher data to be shared with or accessed by third parties).

- Ethical practices (e.g. modern slavery, labour conditions).
- Credit check (for contracts above a spend of £75,000 or equivalent in local currency only).
- Cybersecurity protection.

The VEA process includes a newly enhanced due diligence screening service provided by the Dow Jones Risk Centre platform. This covers risk on corruption, modern slavery, environmental issues, a sanctioned country list, sustainability and issues found available in public sources. We receive alerts regarding any new risks and any concerns are identified and followed up.

If there is a significant regulatory change, new questions are added to the VEA to help ensure continued compliance with relevant requirements.

Screwfix (via Kingfisher’s Global Business Services centre in Krakow) has created a new tool which automates the VEA process, making it easier to use. This will be rolled out to other banners. The Data Protection team has also added generative AI-related questions in the VEA as well as data protection assessments.

We are integrating our new tool with some of the systems we use for due diligence processes, particularly Dow Jones and One Trust, and will use the tool to send specific questionnaires to suppliers based on the research findings.

Phase 2: EcoVadis Sustainability Assessment

We request that suppliers with an annual spend greater than £75,000 complete a regular EcoVadis Sustainability Assessment as part of the tender process, in addition to the VEA process. New contracts include a requirement for the EcoVadis assessment to be completed within 12 months.

EcoVadis is a third-party assessment tool and collaborative platform, used by more than 150,000 companies. It covers four themes:

- Labour and human rights
- Environment
- Business ethics
- Sustainable procurement

Supplier assessments are reviewed by EcoVadis and a scorecard is provided highlighting strengths, weaknesses and risk areas.

The methodology behind EcoVadis’ medal rating system was revised last year, so we are unable to make accurate year-on-year comparisons. The new scoring methodology will be in use going forward.

We have also run all our suppliers’ tax codes through the EcoVadis system, to find any suppliers that have not shared their EcoVadis scorecard.

Historically we have focused on a spend-based approach for prioritising EcoVadis

assessments. However, from next year, we will also focus on suppliers’ risk levels and prioritise those in high-risk categories as highlighted by the GNFR risk matrix.

Monitoring progress

We continue to monitor progress of all suppliers who have been EcoVadis assessed. In 2024, this amounted to 75% of in-scope GNFR spend (annual spend over £75,000), the same as the previous year.

70% of suppliers who were re-assessed by EcoVadis improved their score, through changes to their internal processes, reporting and systems. In total, 82% of suppliers we are connected to in the platform improved or maintained their score when re-assessing. We plan to increase the number of suppliers assessed by EcoVadis (see ‘Looking to the future’ on page 26).

Labour and Human Rights

The EcoVadis assessment has a key theme of Labour and Human Rights which includes child labour, forced labour and human trafficking, working conditions and stakeholder engagement on human rights. Questions are asked about companies’ human rights policies and governance and whether they have nominated colleagues with responsibility for human rights.

We are integrating a ‘right to audit’ clause into new contracts with GNFR suppliers. Having completed the GNFR risk assessment, using the updated risk matrix,

we are now working to understand the resulting action plan (see ‘Risk Assessment’ on page 8).

EcoVadis medals scored suppliers¹

The EcoVadis score (0-100) reflects the quality of a company’s sustainability management system at the time of the assessment. EcoVadis medals and badges recognise eligible companies that have completed the EcoVadis assessment process, and compared to other assessed companies, have demonstrated a strong management system that addresses sustainability criteria, as outlined in the EcoVadis methodology.

The eligibility criteria for scorecards published starting 1 January 2025, are as follows:

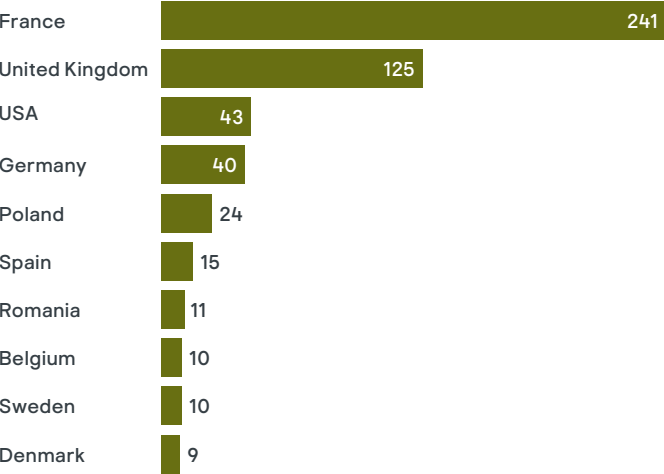
Medals

The medal eligibility criteria outlined below apply to all scorecards published from 1 January 2025, and are defined by EcoVadis. These benchmarks are based on the performance of all suppliers assessed globally on the EcoVadis platform, which includes Kingfisher GNFR suppliers. Medal rankings are awarded according to a supplier’s percentile ranking relative to the entire assessed supplier base:

- Platinum** – Top 1% (99+ percentile)
- Gold** – Top 5% (95+ percentile)
- Silver** – Top 15% (85+ percentile)
- Bronze** – Top 35% (65+ percentile)

The chart details the scorecard achieved by our GNFR suppliers.

Top 10 supplier countries assessed on EcoVadis
Suppliers by country/territory



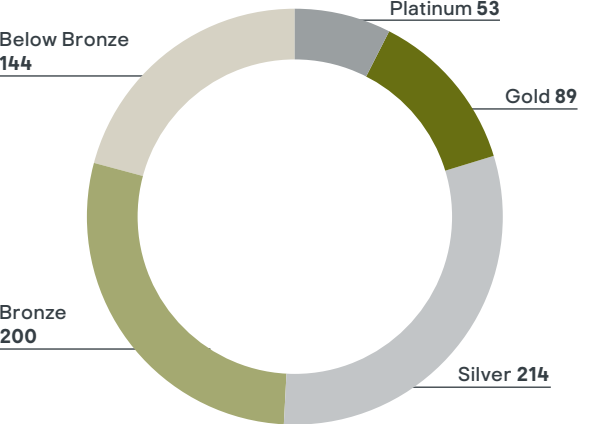
i

EcoVadis Improvement Programme

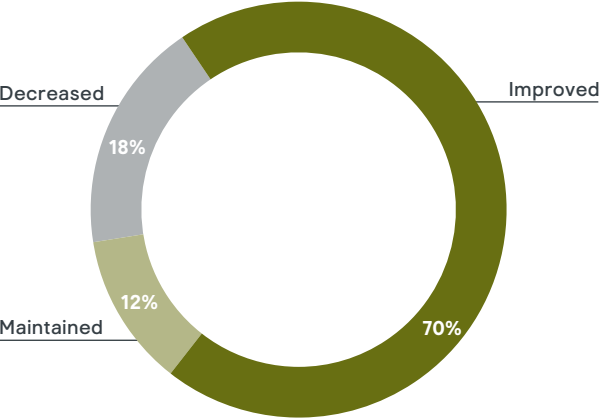
The EcoVadis Improvement Programme has been running for just over a year. Our aim is to continue to communicate with suppliers, prioritising those based upon spend and risk, to suggest ways they could improve their scorecard. 53 suppliers were contacted in 2024.

The Responsible Business team has been working with Group Procurement to identify how and where they can add value to the Programme.

EcoVadis medals
Scored suppliers¹



Evolution of re-evaluated suppliers
Assessment score



¹ EcoVadis has altered the medal system to be more stringent than last year. For example, altering the bronze medal criteria from being in the top 50% to the top 35%.

Going beyond audit: addressing our salient human rights issues

While playing an important role in improving supply chain standards, ethical audits alone may not address the root causes of non-compliance with our policies. We are therefore initiating and supporting projects that encourage wider positive change within our supply chains.

The following programmes focus on addressing the identified salient human rights issues and seek to mitigate modern slavery risks, build supplier capacity, and enable direct engagement with workers in our supply base.

Our current programmes

Programme	About	Salient human rights issue/s	Partner/Internal team	Impact
Responsible recruitment of migrant workers	The programme is aimed at resolving recruitment fee issues and eradicating debt bondage, or bonded labour, from our supply chains.	Modern slavery	Far East Buying Office and Elevate (LRQA)	We identified issues with 13 suppliers in three countries. By the end of 2024, eight of these had been resolved. We are working with the remaining five.
Horticulture deep dive	We analysed the results of the Horticulture survey completed in 2023 and trialled a policy ¹ roll-out for our largest OEB suppliers and their growers, impacting a higher number of risk workers.	All	O&S EMEA and twentyfifty	Due to be rolled out to all OEB horticulture suppliers in 2025. These suppliers will be required to share with us a list of growers to give us visibility of their ethical compliance status.
Everyone's Business	This is an app where colleagues can upload photos and feedback from any factory visits thereby providing evidence of the conditions or any potential issues outside of our standard audit process.	Modern slavery, child labour, freedom of association, health and safety	O&S and SLR Consulting Limited	We have piloted the app with colleagues in Commercial and Quality teams, ahead of a wider roll-out in 2025.
Vendor Hub	This contains a film, factsheet and key documents available in six languages.	Modern slavery	Merchant and The Clearing	The Ethical Compliance section of the Hub recorded 1,391 views, with 975 unique users.
Indirect manufacturer supplier control (Tier 2)	This is aimed at creating a clear supply chain map to ensure all indirect suppliers from our hand tool and hardware categories meet our minimum ethical requirements.	Modern slavery, child labour, freedom of association, health and safety, wages and working hours	Responsible Sourcing and QA teams from our Far East office and Sedex-approved audit companies (to carry out the verification audits)	During 2024, we collaborated with 18 direct suppliers and 186 indirect suppliers. We collected 99 ethical audit reports and 87 Self-Assessment Questionnaires (SAQ) and conducted three verification audits.

i Indirect suppliers

In addition to enhancing the visibility and transparency of the supply chain, we collaborated with 18 direct suppliers and 186 indirect suppliers in 2024 to assist them in managing the ethical performance of their suppliers. They provided 99 ethical audit reports and 87 Self-Assessment Questionnaires (SAQs). Three independent third-party audits were also conducted to verify the effectiveness of the direct suppliers' systems in managing their suppliers. All audits met Kingfisher's requirements.

¹ All horticulture suppliers (supplying plants, flowers, live trees or grass) are required to have a valid ethical audit, meeting Kingfisher's current acceptance criterion. If the direct (tier 1) supplier is not growing the products they are selling to us, but are instead using indirect/third-party growers to source the products, the supplier is responsible for sharing the full list of growers they are using to source the products (core and promotional range) for all banners supplied, ensuring all growers selected to supply Kingfisher have a valid ethical audit, and sharing those audits with us. Please see our Vendor Sourcing Guidelines for a list of the current audits accepted as well as the following certification: GLOBAL GAP GRASP and MPS SQ. The supplier should also share with us the list of growers they plan to use in the next 12 months based on the range of products supplied. Any changes to the list of growers should be shared in advance with the Kingfisher Ethical Compliance team, or the relevant banner team.

Supplier engagement

We have an ongoing GFR supplier engagement programme and provide training to help suppliers build their knowledge and understanding of human rights issues and how to develop their approach to managing and mitigating human rights and modern slavery risks.

The Vendor Hub we created for new suppliers received approximately 1,500 views. The Ethical Compliance section of the Hub recorded 1,391 views, with 975 unique users engaging with the Ethical Compliance chapter. Additionally, the onboarding video was viewed 113 times.

Suppliers are sent an email as part of their onboarding process with a link to the Hub, which includes a film that showcases the broad benefits of being an ethical business such as stakeholder trust, employee retention and increased productivity. The six-minute video – which is available in six languages – provides information to support suppliers on their journey to achieving ethical compliance. It has been shared with our banners and Buying Offices, and our Sourcing colleagues have been asked to share it with suppliers and prospective production sites.

In addition to the film, factsheets explain Kingfisher’s ethical requirements, including our audit grading matrix, what a non-conformance is, how to resolve it,

timeframes, and the collaborative support available to our suppliers and sites.

The Hub includes a section on training, with access to videos on topics such as Sedex’s new audit methodology SMETA 7.0 and a bespoke training on audit non-compliances in Turkey.

We sponsor the Responsible Recruitment Toolkit developed by Stronger2gether (an industry collaboration) to provide free training and support to suppliers and labour providers. The toolkit provides good practice guidance, based on global standards, and includes a self-assessment process to help suppliers monitor and improve progress on responsible recruitment among their labour providers. We provide information about the toolkit to both GNFR and GFR suppliers.

Further examples of our supplier training include:

Training	Description of supplier training	Training provider
Salient audit issues in Turkey	Health & Safety issues, working hours, employer responsibilities, overtime.	O&S and Impactt/Minerva BVR
Specific Corporate Social Responsibility (CSR) webinar	Overview of the new regulations incoming (CSRD, CSDDD, EUDR) plus an explanation and reminder about our Ethical Policy and Wood and Paper Policy.	Castorama France Quality team and Kingfisher France Head of Climate Biodiversity
Supplier Convention	Training for our top suppliers on our CSR strategy and targets on our Ethical Policy, Wood and Paper Policy, SHP green star and Carbon roadmaps.	Brico Dépôt France CSR team
Responsible recruitment webinar	An introduction to responsible recruitment including relevant laws, requirements and best practices.	O&S and LRQA

Whistleblowing and escalation

At Kingfisher, we are committed to maintaining an open culture with the highest standards of honesty and accountability, where colleagues and suppliers can report any ethical concerns safely and without fear of retaliation. These include modern slavery and any other human rights violations.

Our approach includes:

- **SpeakUp Hotline:** We launched a new communication campaign in November 2024 to raise awareness of our reporting channels (including our independent and confidential whistleblowing hotline) among our banner and Group functions colleagues. The number of SpeakUp reports has consistently increased in the last few years, following stronger communication and training. See 'SpeakUp' on kingfisher.com.
- **Training:** We review our Code of Conduct compliance training annually. The training includes sections on modern slavery as well as conflict of interest, gifts and hospitality.
- **Investigation:** All reports to the hotline are reviewed and, where necessary, investigated. Non-sensitive cases are investigated by the respective banner,

and the outcome is reported to the relevant local Ethics and Compliance Committee as well as being reviewed by Central Compliance on an ad hoc basis. When needed, sensitive cases are investigated at Group level and reviewed by the Group Ethics and Compliance Committee.

- **Board oversight:** The Board and the Audit Committee of the Board receive regular updates on whistleblowing reports, cases and trends.

Our Code of Conduct and Supply Chain Workplace Standards, as well as our ethical audits, include requirements for suppliers to provide a means by which workers can openly communicate and share grievances with management, without fear of reprisal, intimidation or harassment.

There were four reports relating to human rights and modern slavery made via our whistleblowing hotline in 2024, all of which have been investigated and resolved.

Modern slavery escalation procedures

We have established a protocol for handling any incidents of modern slavery, to ensure we respond quickly, effectively and consistently. This involves escalating issues to senior director level, gathering information and investigating non-compliances, as well as a process for

deciding further action or escalation. The protocol means we can coordinate a quick response to any concerns raised and that it has been communicated to the relevant people in our Risk, Legal Compliance, and Sourcing teams.



Employee training and awareness building

We maintain a regular training programme across the Group to ensure colleagues understand modern slavery risks and how to report concerns.

Training is delivered through digital e-learning modules, interactive specialist workshops and awareness presentations.

Post-training feedback is used to update and improve our training provision. To make sure our training is as relevant as possible for colleagues, we also use insights from reports to our SpeakUp channel.

i

Code of Conduct training

Our Code of Conduct training has been completed by over 92% of Kingfisher employees globally and we will continue to roll it out as part of the ongoing compliance training. The training includes sections on anti-bribery and corruption, gifts and hospitality and conflicts of interest. In 2024 we updated the modern slavery section, including a scenario question to help people spot indicators or signs of modern slavery.

Training activity in 2024

Our training programme reached over 700¹ colleagues in a variety of roles during 2024.

Training title/Topic	Description of content	Who is the training for?	Training provider
Human Rights and Ethical Policy (plus Wood and Paper Policy)	This training helps Market Managers and Market Specialists better understand our CSR approach and the importance of our Ethical Policy including our requirements for suppliers.	Castorama France Market Managers	Castorama France Ethical team
Ethical Policy	Follow up with the Commercial team about critical suppliers and a reminder about the Ethical Policy.	Castorama France Commercial team	Castorama France (deco and building and outdoor)
Quality and Sustainability	Online training module including ethical sourcing.	All B&Q colleagues	Online training
Kick-off Market and Buyer Teams	Training on our CSR strategy with a focus on our Ethical Policy and Wood and Paper Policy (requirements and process).	Buying teams	Brico Dépôt CSR team
Lunch and learn	The People team attended a 'lunch and learn' session with Slave-Free Alliance with training on the indicators of modern slavery and how to spot the signs.	Group People team	Slave-Free Alliance
New staff training	Training for new Far East Buying Office staff who joined Kingfisher in 2024. Covers responsible sourcing requirements (ethical compliance, working hours, responsible recruitment, indirect supplier control and Dow Jones management).	New Far East Buying Office staff	O&S Shanghai Buying Office and Hong Kong Human Resources Department
Human Rights Day: Understanding the hidden crime of modern slavery	Overview and explanation of modern slavery in 2024 including survivors' stories, how to spot the signs of modern slavery, how to report concerns of modern slavery, description of support available for survivors, and key statistics of modern slavery cases and patterns.	Group functions	Hestia
Ethical sourcing overview	Training internal Commercial teams on what is required of them, when we capture the information, the importance of ethical sourcing, and some examples of what has happened in our supply chain.	Screwfix Commercial team	Screwfix Responsible Sourcing team

1 Total attendees counted for each training session; some employees may have attended more than one session.

Partnership and collaboration

To develop and implement our programmes, and tackle wider challenges for our sector, we work with human rights and modern slavery experts, industry organisations, trade unions, peer companies, government agencies, multistakeholder initiatives, audit platforms, sustainability assessment tools and NGOs, among others.



SLAVE-FREE ALLIANCE

Working Towards a
Slave-free Supply Chain



Slave-Free Alliance: A key partner on modern slavery

We have been working with Slave-Free Alliance (SFA), a social enterprise initiated by anti-slavery charity Hope for Justice, for several years. This year they have helped us develop our policies, train our teams and our suppliers, and strengthen our audit and due diligence approaches. This includes:

GNFR ethical risk matrix

We worked with Slave-Free Alliance to create our GNFR ethical risk matrix. This has identified the number of low-, medium- and high-risk suppliers we have in each of our three purchase categories (in terms of spend) and will be used to inform our risk-based approach.

Legislation Horizon Scan Report and Research

Slave-Free Alliance conducted in-depth research to identify upcoming legislation which may affect Kingfisher from a human rights perspective.

Child Labour Standard Operating Procedure (SOP)

Slave-Free Alliance reviewed and advised us on the development of this document which sets out Kingfisher's position on child labour, expectations of suppliers, how to report incidents of child labour, investigation processes, remediation and the follow-up process. The procedure will be communicated internally, along with relevant training, in 2025.

Training

Slave-Free Alliance ran an hour-long 'lunch and learn' session for our People team around what modern slavery is and how to spot the signs.

Due diligence reporting

Slave-Free Alliance reviewed our Modern Slavery Statement and human rights due diligence reporting to make sure it was in line with legislation.



Our key partners

We continue to work with partners to address human rights and modern slavery risks and participate in forums with the aim of improving standards across the retail sector.

Partner	About	How we're working together
amfori BSCI	A platform for social-related supply chain information.	In addition to using the platform to monitor our site compliance, we have been working with the UK London connect group to discover additional elements of the platform that could benefit our programme, e.g. Country Risk and Self-Assessment Questionnaire (SAQ) development.
Better Retail, Better World	A retail sector collaboration led initiative by the British Retail Consortium (BRC) supporting the UN Sustainable Development Goals including on human rights and decent work.	We are working with the BRC utilising the Better Retail, Better World framework to address the UN Sustainable Development Goals.
British Retail Consortium (BRC) Ethical Working Group	A sharing forum for updates on the latest ethical labour developments in the supply chain, including human rights due diligence and modern slavery.	As a member of the working group, we collaborate with our industry peers and share best practice for human rights due diligence in the retail supply chain.
EcoVadis	An online assessment programme that provides support to suppliers to improve and assess their sustainability credentials.	Used to assess our GNFR suppliers with whom we spend over £75,000.
Elevate	A supply chain consultancy specialising in responsible recruitment.	We have collaborated with this consultancy agent to develop project training materials and deliver online training to suppliers. Some suppliers have independently elected to utilise Elevate as a consultancy to help them address the issues found at their sites.
Hestia	A charity that supports adults and children in times of crisis. Hestia is the largest provider of modern slavery support in London and the southeast.	On Human Rights Day 2024 Hestia ran a session with around 250 people from Group functions on understanding the hidden crime of modern slavery.
Impactt	A consultancy that helps businesses improve labour rights in their supply chains. They offer diagnostics, solutions and insights to create better jobs and more profitable operations.	We partnered with them to develop and deliver the 'Salient audit issues in Turkey' training.
Maplecroft	A global risk intelligence company providing insight into sustainability, resilience and ESG issues.	Provides data for our ethical audit risk matrix.
Sedex	A platform providing a service package to identify, manage and assess social and environmental supply chain data, which also owns the SMETA audit methodology.	We collaborate with Sedex to gain a better understanding of their latest requirements, how to integrate them into Kingfisher's ethical requirements, and assist our suppliers in meeting these requirements.

Partner	About	How we're working together
Slave-Free Alliance	A social enterprise non-profit set up by Hope for Justice that works with victims, law enforcement agencies and businesses to help bring about a slavery-free supply chain.	We have collaborated with Slave-Free Alliance throughout the year, mainly on the risk matrix for GNFR and the lunch and learn (see 'Employee training and awareness building' on page 22).
SLR Consulting	Owner of Everyone's Business, an app where colleagues can upload photos and feedback from factory visits.	We have piloted the app with colleagues in Commercial and Quality teams, ahead of a wider roll-out in 2025.
Stronger2gether	A not-for-profit organisation that provides businesses with practical training, resources, business services and collaborative programmes.	We are sponsoring its Responsible Recruitment Toolkit to provide free training and support to suppliers and labour providers.
TUV Rhineland	An audit company conducting Environmental Health & Safety (EHS) audits for Kingfisher electroplating suppliers.	TUV designed special assessment kits and conducted assessments to verify the electroplating processes of a regional cohort of Kingfisher's direct – and indirect – suppliers for compliance with EHS laws and regulations.
United Nations Global Compact Child Labour Working Group	A United Nations Responsible Business pact covering human rights, labour standards, anti-corruption, and environment.	We report progress against the 10 principles of UNGC, one of which is human rights. We have worked with them on awareness-raising work with the Responsible Business network as part of Anti-Slavery Day. Kingfisher is also part of UNGC's child labour and modern slavery working groups.

Looking to the future

Our commitment to address modern slavery risks and uphold the human rights of every individual in our business and supply chain is an ongoing process. We will strive to keep improving our practices and reviewing our priorities.

In the immediate future, we will concentrate on:

Risk mitigation

- Continuing to utilise the outcomes from the Saliency Assessment and Human Rights Gap Analysis.
- Continuing to review the GNFR risk matrix and how this can be utilised to be implemented into our due diligence approach.

Training

- Doing more training to include GNFR, Commercial teams and Buyers, following the success of the modern slavery workshop.
- Continuing to conduct workshops and training for Ethical and Sustainability leads.

Supply chain transparency

- Increasing the transparency within our global supply chains for both GFR and GNFR.
- Expanding the number of GNFR suppliers assessed by EcoVadis and working with our suppliers to increase their scores.
- Making progress on our target to remain and consistently achieve above 95% compliance to policy for both OEB suppliers and production sites.
- Continuing to support our banner Sustainability teams, in driving disclosure of production sites by non-OEB suppliers.
- Expanding our horticulture grower mapping to include all OEB suppliers.

Addressing and reducing the risk of modern slavery

- Continuing to raise awareness internally, working with the Responsible Business network and increasing internal communications.
- Extending the existing communications for Anti-Slavery Day to include teams not working directly with suppliers.
- Rolling out a child labour standard operating procedure, to provide guidelines for Kingfisher Group Companies to follow on the management of situations where underage workers are alleged to exist in production sites.

Beyond audit and supplier capacity building

- Extending our 'beyond audit' programmes including:
 - gathering worker voice feedback in addition to ethical audits;
 - rolling out the Everyone's Business app;
 - distributing a survey to OEB suppliers to understand how our purchasing practices impact workers and working conditions within our supply chain; and
 - working with top Screwfix suppliers to conduct a detailed review of their production sites and audit findings and being more proactive about closing any open audits.

Upcoming legislation

- The reporting landscape is evolving rapidly, and preparations are being undertaken to ensure we will be ready to meet the requirements of regulations like the Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD). Our focus here is to understand the relevant scope and the due diligence processes required for our business.



Modern Slavery Act Transparency Statement approval

Entities covered by this statement

This statement covers Kingfisher plc and all its subsidiary undertakings. This includes the following UK subsidiaries with a turnover of £36 million or above:

- B&Q Limited
- Kingfisher International Products Limited
- Kingfisher Information Technology Services (UK) Limited
- Screwfix Direct Limited
- Screwfix Spares Limited

Approval process

This Transparency Statement was approved by the Board of Directors for each entity listed above/below. It is signed by the Kingfisher Chief Executive Officer who is also a member of the Board of Directors for Kingfisher plc.



Thierry Garnier, Chief Executive Officer
24 June 2025

Date signed off by Board of Directors

Kingfisher plc: 24 June 2025

B&Q Limited: 18 June 2025

Kingfisher International Products Limited: 18 June 2025

Kingfisher Information Technology Services (UK) Limited: 23 June 2025

Screwfix Direct Limited: 19 June 2025

Screwfix Spares Limited: 19 June 2025

Slave-Free Alliance has completed a review of Kingfisher's Modern Slavery Act Transparency Statement 2024/25. This included the structure and content of the Modern Slavery Statement and provided feedback in respect of compliance with current and proposed new UK legislative requirements and alignment with good practice. All observations and recommendations were fed back to Kingfisher as part of a separate report.

Kingfisher



castorama



SCREWFIX

