

Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Horbury Group's slavery and human trafficking statement for the financial year ended 31 May 2023. Horbury supports the principles and aims of the Modern Slavery Act, has a zero-tolerance approach to slavery and human trafficking and expects all its supply chain to share these values.

The Horbury Group consists of seven companies based solely in the UK:

- Horbury Support Services Limited;
- · Horbury Joinery Limited;
- Environ Safety Management Limited;
- Titan Flooring Limited.

- · Titan Interior Solutions Limited;
- Horbury South West Limited;
- Horbury Property Services Limited;

The group has its head office in Rotherham and regional office in Caerphilly. Our supply chain is predominantly based in the UK. We have policies and procedures in place to control the selection of suppliers and minimise the risk of Human Trafficking and Modern Slavery.

All our workers need to be alert to risks, however small, in our business and in the wider supply chain and to report concerns. We have a Whistle-Blowing Policy and a formal reporting structure which supports these responsibilities and facilitates timely escalation and resolution of issues.

We are committed to ensuring that neither modern slavery nor human trafficking feature in our supply chain or in any part of any of our businesses. We are committed to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to, as far as practical, ensure slavery and human trafficking is not taking place anywhere in our operations.

Our materials are mainly sourced from UK-based manufacturers and distributors. We consider the modern slavery risk in this category to be low but will continue to make enquiries of suppliers and perform audits to satisfy ourselves that their policies and procedures are robust.

Our labour supply chain incorporates a limited number of preferred agencies as well as subcontract organisations. Our Procurement Team continually reviews our subcontractor register and newly onboarded subcontractors to ensure that checks are consistently carried out and to drive improved performance and compliance into our supply chain. We continue to enhance our onboarding process by utilising an electronic Right to Work system, which has improved the quality of the checks that we carry out, thus ensuring that the obligations are met for the responsibility that the business holds to prevent illegal working.

The HR Manager is kept up to date with current information by attending regular webinars and in turn disseminates this to the wider team.

All new Employees receive training within their induction on the signs of Modern Slavery to look out for and we will continue to brief our staff on modern slavery and human trafficking and their responsibilities in this area by issuing periodic updates via email, our intranet and posters.

This statement was approved by the Board of Directors of the Horbury Group

Trevor Wragg Chief Executive 08/03/2024

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