



Modern Slavery and Human Trafficking Statement

ROPER RHODES

Table of contents

1. Introduction	2
2. Organisational Structure & Activities	2
2.1. Our Supply Chain	3
3. Our Due Diligence	4
3.1. Our Governance, Policies & Procedures.....	5
3.2. Annual Risk Assessments.....	6
3.3. Mitigation and grievance mechanism	7
3.4. Training.....	7
3.5. Next steps.....	7
Approval	7

Title & Version:	Modern Slavery and Human Trafficking Statement 2025	Functional areas:	HR & Sustainability
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1. Introduction

This statement is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 (the “MSA”) and constitutes the slavery and human trafficking statement of Roper Rhodes Ltd (“Roper Rhodes”, “we”, “our”) for the year ended 31 December 2024.

At Roper Rhodes, we are committed to improving our practices to combat slavery and human trafficking and are committed to our due diligence in order to minimise and mitigate any risk¹ of slavery and human trafficking taking place in our supply chains or in any parts of our business.

Modern slavery and human trafficking are a violation of fundamental human rights:

1. Modern Slavery is a term which encompasses slavery, servitude and forced or compulsory labour. It includes Child Labour which, as defined by the International Labour Organisation (“ILO”), is work that deprives children of their childhood, their potential, and their dignity, and that is harmful to their physical and mental development.
2. Human trafficking is defined as arranging or facilitating the travel of another person with a view to that person being exploited.

The purpose of this statement is to set out our Due Diligence and any further steps that Roper Rhodes has taken during the year January 2024 to December 2024 to ensure that modern slavery and human trafficking is not occurring in our organisation or in our supply chain. It also highlights our next steps for 2025.

This policy statement is reviewed annually, updated as appropriate, and published on our website.

2. Organisational Structure & Activities

Roper Rhodes was founded in 1979 and has grown from a small family business to being one the of UK’s leading independent suppliers of bathroom furniture and products.

Roper Rhodes Ltd has been acquired by Svedbergs Group as of 1 December 2021. Svedbergs Group operate especially in the Bathroom sector across the Nordic region, and they are specialists in the design and manufacture of bathroom products and most notably bathroom furniture².

The Roper Rhodes Group incorporates all of the brands and ranges we sell:

- Roper Rhodes
- R2
- Tavistock

We have approximately 245 employees over two sites:

- Head Office in Bath
- National Distribution Centre in Portbury, Bristol

Within each site we have the following departments:

- Head Office:
 - Directors
 - Customer Service
 - New Product Development

¹‘Risk’ in human rights and environmental terms translates into identifying adverse human rights or environmental impacts and the probability that these impacts might occur.

² Svedbergs Group consist of: Svedbergs i Dalstorp AB, Macro Design AB, Cassoe A/S, Roper Rhodes Ltd and Thebalux.

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- Finance
- IT
- Marketing Communications
- Supply Chain/ Procurement
- Sustainability
- National Distribution Centre:
 - Warehouse
 - Quality Control
 - HR
 - Product Displays

We also have a field sales force who cover England, Ireland, Scotland and Wales. We are a Business to Business organisation selling our products to Bathroom showrooms across the UK and Ireland. Our products are designed in the UK and manufactured around the world (please see Supply Chain information below).

Our Management Systems are modelled upon ISO standards aimed at delivering continuous improvements over time. We set Policy Objectives over the issues to be managed; we set annual measurable goals (targets), and determine the action required to meet those goals. We check our progress to ensure our policy objectives and set goals are being achieved.

2.1. Our Supply Chain

We have Supply Chain team of 6 employees who work with our suppliers to ensure efficient delivery of our products by:

- Planning delivery timetables
- Ensuring stores have enough stock
- Making sure suppliers have enough stock to meet demand
- Overseeing the ordering and packaging process
- Monitoring stock levels
- Tracking products through depots to make sure they arrive at their destination
- Overseeing arrival of shipments

In 2024, we dealt with suppliers from Austria, Belgium, Bulgaria, Cambodia, China, Germany, Italy, Poland, Portugal, Spain, Sweden, Taiwan, Turkey, Ukraine and the United Kingdom (highlighted in blue on the map below).

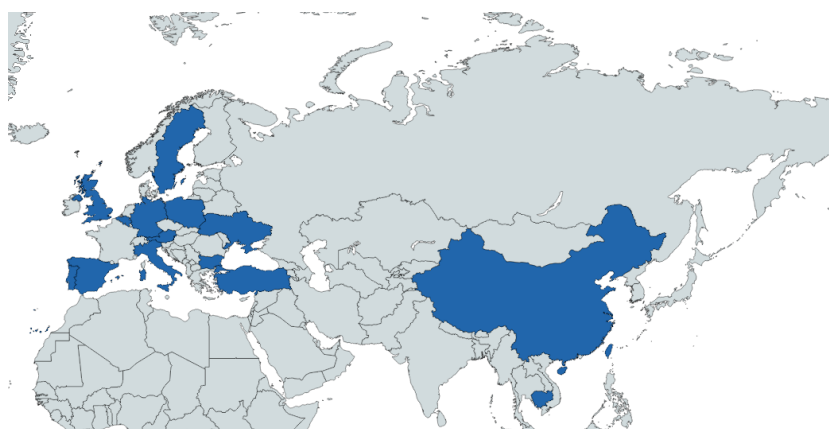


Table 1. Roper Rhodes supply chain map 2024

Title & Version:	Modern Slavery and Human Trafficking Statement 2025	Functional areas:	HR & Sustainability
Issue date:	January 2025	Review date:	January 2026
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At Roper Rhodes we are absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains, including those of its sub-contractors and partners, are free from slavery and human trafficking. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

3. Our Due Diligence

As part of Roper Rhodes's due diligence processes into slavery and human trafficking, the suppliers' approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources is continually monitored.

We have effective business practices in place to ensure effective reporting and action to address modern slavery. These include:

- Group factory evaluation reports (audits run by Roper Rhodes, and third-party audits)
- Proof of minimum working age requirements
- Risk management processes
- Grievance policy
- Company culture of respect for human rights and zero tolerance of modern slavery throughout the organisation.

To achieve our goals we have been a Sedex (Supplier Ethical Data Exchange) member since 2012, and we annually complete the SAQ (Self-Assessment Questionnaire³). We also use Sedex to collect supply chain information, to run risk assessments, and to require SMETA audits (Sedex Members Ethical Trade Audit) for our suppliers, as relevant.

Our Supply Chain requirements

We require all our suppliers to sign the Svedbergs Group Supplier Code of Conduct. We also require our Product suppliers to:

1. Register on the Sedex platform
2. Complete the Sedex SAQ
3. Run a SMETA audit if we deem necessary e.g. the supplier operates in a high-risk country, as identified after annual risk assessments, or their SAQ and audit has flagged critical non-compliances.

³ It assesses Labour Standards, Health & Safety, Environment and Business Ethics performance.

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3.1. Our Governance, Policies & Procedures

Governance

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chain.

Furthermore, a 'Responsible Sourcing' working group has also been created to:

- Implement our Supplier Risk Management Policy
- Update the Roper Rhodes Sedex SAQ annually
- Run annual risk assessments using Sedex Radar⁴
- Engage our suppliers to align with our requirements
- Monitor, track and report on suppliers' compliance and performance.

This working group is chaired by the Sustainability Manager, who also reports monthly to the Operations Director. Any supplier non-compliant with our standards, is flagged to the Operations Director and further steps are taken to ensure that any risk is mitigated.



Table 2. Supplier Risk Management Governance

Policies & Procedures

This Policy Statement takes into account, and supports, the policies, procedures and requirements documented in our Management System. The implementation and operation of this management system underlines our commitment to this policy.

The following policies exist within the business and link to the company stance on Modern Slavery & Human Trafficking:

- Human Rights Policy
- Modern Slavery Policy
- Recruitment Policy
- Disciplinary Policy
- Grievance Policy
- Anti-Corruption & Bribery Policy
- Social Media Policy
- Whistleblowing Policy
- Supplier Code of Conduct
- Employee Code of Conduct
- Supplier Risk Management Policy⁵

⁴ Sedex risk assessment tool.

⁵ Our Supplier Risk Management Policy in particular covers how we classify, assess, and identify risks in our supply chain and how we deal with cases of non-compliance to our requirements and standards.

Title & Version:	Modern Slavery and Human Trafficking Statement 2025	Functional areas:	HR & Sustainability
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3.2. Annual Risk Assessments

The aim of running annual risk assessments is to identify the various risks to human rights and the environment, that can occur in industries and regions around the world.

At Roper Rhodes we use the Sedex Radar tool to prioritise annual risk assessments⁶, and to identify the most common or severe issues. We develop a risk assessment report annually to summarise the results of the analysis, any significant findings and confirm any further actions.

3.2.1. Annual risk assessment result – an overview

Country/Region and Sector risk assessment

The Country/Region and Sector risk assessment ran in January 2025 for calendar year 2024, confirmed which suppliers are based in high-risk countries (China, Turkey and Cambodia). All other suppliers we source from are based in low to medium risk countries⁷.

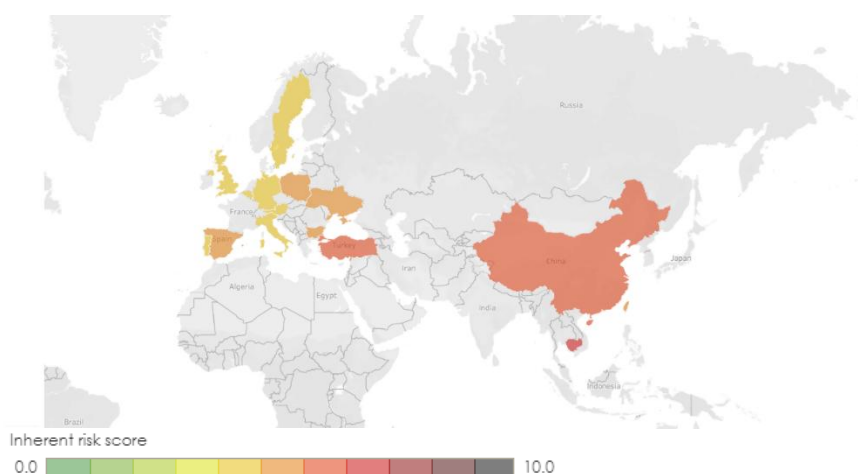


Table 3. The Country/Region and Sector risk assessment map

Site-specific risk assessment

Additionally, we ran site a specific risk assessment, to identify the risks related to each supplier, based on their answers to the Sedex SAQs and the results from their SMETA audits.

When critical, major and minor NCs have been reported, they relate to:

1. Working hours
2. Wages
3. H&S
4. Environment

When NCs are identified, the supplier is requested to:

1. Repeat a SMETA audit, as relevant depending on the type of NCs
2. Close any NCs in a timely manner.

In the evaluations conducted in 2024, no risks associated with Modern Slavery have been identified across our own organization and supply chain. One business critical risk linked to structural issues of the premise, has been identified across our supply chain, which was immediately dealt with by the supplier. A third-party auditor conducted a SMETA follow-up audit to verify the action taken from

⁶ Running annual risk assessment helps us to understand what the most likely issues in our organisation and supply chains are and will be, even at the earliest stages of risk assessment.

⁷ This assessment considers the geographical location and industry of our Tier 1 suppliers.

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the supplier to correct the issue, and confirmed that the business critical non-conformance was resolved in a timely manner.

3.3. Mitigation and grievance mechanism

We mitigate risks in our organisation and supply chain by:

- Self-assessing our organisation using Sedex.
- Training our employees on Modern Slavery & Human Trafficking, and by communicating the relevant policies.
- Building a strong onboarding process for our suppliers which prioritises compliance with our legal and sustainability requirements, and our Supplier Code of Conduct; specific clauses are being added to the terms of conditions of our contract.
- Analysing the SAQs and SMETA audit reports, and using the tools provided by Sedex to track and monitor compliance and risk status.

Grievance procedure will apply to all employees as per our Grievance Policy, and cover all cases where the employee wishes to raise a particular grievance in connection with their employment. In our whistleblowing service, internal and external stakeholders can submit a report on suspicion of serious misconduct or violations to human rights.

3.4. Training

This statement and accompanying policies are made available to all employees when they join the company. Any changes are communicated across the company and training provided if needed. In 2023 we also launched e-learning training sessions on Modern Slavery and Human Trafficking for all our employees. More in-depth sessions will also run for specific employees and managers based on their job role.

3.5. Next steps

We will:

1. Continue towards achieving our targets⁸ by 2030, keep assessing our supply chain to reduce and mitigate any risks in relation to Human Rights violations, and make sure our suppliers align with our standards.
2. Continue to be vigilant when assessing areas of potential risk within our supply chain.
3. Monitor suppliers' NCs and work towards ensuring that all NCs are closed in a timely manner.
4. Implement our Supplier Risk Management Policy.
5. Act promptly where a compliance breach has been identified or flagged.
6. Continue to provide training and awareness both internally and externally.
7. Measure and report progress on the actions.

Approval

This statement has been approved by the company's board of directors.

Signature:



⁸ 20% of our strategic suppliers to be audited each year; 100% of our critical suppliers to be audited by 2030.

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