

# ROXOR

## Modern Slavery Act 2015 statement (Year end 2023)

Roxor are a proud manufacturer & distributor of bathroom products to the retail industry in the UK & Europe. Products are distributed from our own warehousing facility based in the UK. We have full control over our supply chain which we source products from in the UK, Europe, UAE and the Far East the majority coming from partly or wholly owned factories.

We have long been committed to protecting and improving the rights, working conditions, and well-being of workers throughout the supply chain. By putting policies in place we have adopted a zero tolerance approach to slavery.

To ensure our supply chain remains free from slavery we have a range of policies in place which are contained/delivered through our Vendor Questionnaire and Company Handbook.

### Vendor questionnaire policies include:

- Ethical sourcing and ETI base code
- Health & Safety
- Environmental management
- Corruption & Bribery
- Modern slavery & human trafficking
- Workers' rights

### Internal policies in the Company Handbook include:

- Ethical Code of conduct
- Health & Safety
- Whistleblowing
- Ant-bribery & corruption
- Ethical sourcing and ETI base code
- Modern Slavery & human trafficking

These policies clearly outline the expectations and outcomes should there be a breach of policy. Reporting will be fully investigated and appropriate remedial action taken. This may include notifying statutory or legal entities as appropriate.

### Due Diligence processes:

We have well established and stable working relationships with all our key suppliers who all support our approach. We also have English implants at our key supplier in the Far East which gives us a good level of control in a country which is classed as being high risk. All our products are manufactured in up to date purpose built facilities with proper approaches to corporate, social and environmental matters. We regularly audit our suppliers to ensure all local laws are being adhered to. (ETI base code, Modern slavery Act, Human trafficking policies all included).

The audits themselves include clear observations of controls in place in regard to modern slavery, voluntary employment and provision of employment contracts are in place. The contracts include confirmation of employees right to leave work and also the ability to terminate employment upon expiry of reasonable notice (we reserve the right to terminate a contract at any time should instances of modern slavery come to light)

We will monitor and review data going forwards which is published in slavery advisor resources which will help us identify any potential or increased risks when on boarding any new suppliers from areas considered to be at risk. This will also help us to review the effectiveness of the policies we currently have in place.

Cont'd...

# ROXOR

**Training and effectiveness of Anti-Slavery policies:**

- All employees in purchasing have been trained on the policies included in the Company Handbook and Vendor Questionnaire. They understand their responsibilities if they see or suspect any modern slavery is taking place.
- As our supplier audits continue and progress we will develop KPI's to track the effectiveness of our policies.
- We will continue to monitor and learn from best industry practice and have annual refresher training for all staff throughout the supply chain.

These are the steps that Roxor intends to take in the future to prevent modern day slavery/human trafficking in our own business and supply chain and the policy will be update annually.



Michael Duggleby  
CEO

Date: 5th June 2023