

# ROXOR

## Modern Slavery Act 2015 statement (Year end 2027)

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 all those in our supply chain and contractors comply with our values & ethics we have in place a supply chain compliance program, the company's due diligence regarding the supply chain and the supplier approval processes will incorporate a review of the controls in place at our suppliers and their subcontractors regarding slavery and human trafficking. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company directors and senior management shall take responsibility for implementing this policy statement and objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organization and within its supply chain.

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).

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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)

As part of our initiative to identify and mitigate risk we have systems to:

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

- Identify and assess potential risk areas in our supply rains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- We ask our main suppliers to undertake 4 pillar SMETA Ethical Audits themselves as part of our Vendor approval plan/questionnaire and provide evidence of the report and corrective action plans resulting from this. We have also completed one ourselves and are members of Sedex.
- Training is issued annually to all management staff, whether they are involved in supply chain management or not, and what their responsibilities are should they suspect any activity around modern slavery or trafficking.
- Key performance indicators include successful completion of SMETA audits by supply factories every two years, or be able to demonstrate an alternative management system for dealing with potential modern slavery or human trafficking.

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: 2nd March 2026