

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31st March 2024.

Eastbrook Company is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

As per the latest guidance by the UK government, this policy covers the following areas:

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

Organisational Structure & Supply Chains

Eastbrook Company is a partnership and has business operations in the United Kingdom.

We operate in the Import Wholesale & Distribution of high-quality bathroom & heating products

The nature of our supply chains is as follows:

We import goods from a range of countries into the UK, for sale to our customers. delivered through our own Transport network.

For more information about us, please visit our website: www.eastbrooktrade.com

Policies in relation to slavery and human trafficking

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - We conduct checks on all prospective employees to verify that they are eligible to work in the UK.
- Whistleblowing policy - We operate this policy so that employees are able to raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.

- Staff code of conduct - We are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery.
- Supplier Approval Process - This enables us to check the status of the supplier, including current certifications, adherence to local legislation, copies of their current Modern Slavery Policy.

We expect that our suppliers are made aware of our policies and agree to adhere to the same standards.

Due Diligence Process

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal remote supplier audits
- Factory visits where practicable.

Our due diligence procedures aim to:

Identify and action potential risks in our business and supply chains. Monitor potential risks in our business and supply chains

Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

- Provide protection for whistleblowers.
- Using training and staff handbooks, raise awareness on the issue of Modern slavery.

Risk Assessment and Management

We have evaluated the nature and extent of our exposure to the risk of slavery and human trafficking occurring in our UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping using the GSI score (Global Slavery Index) to identify high risk areas.

We consider that we operate in a high-risk environment.

The main area of risk in Eastbrook's normal course of business is in the supply chain for the goods we buy directly from manufacturers, particularly goods manufactured overseas.

To mitigate this risk, we have a supplier code of conduct setting out our minimum requirements and have required all our suppliers of goods to sign up to it.

In addition, as described above, we also mitigate our risk through the audits described above. We do not rely on sole suppliers, so we have the ability to discontinue suppliers if they do not meet our standards. Our indirect supply chain, through which we purchase goods through intermediates, also exposes us to Modern Slavery risk. This continues to be a target area for further review and, if necessary, corrective action.

Key performance indicators to measure effectiveness of steps being taken

We use Key Performance Indicators (KPIs) to measure our effectiveness and ensure that slavery and human trafficking is not taking place in our business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 24 months.
- We will annually review the GSI (Global Slavery Index) to identify areas of the world that may need increased checks on policies / documentation
- We will record any breaches / suspected breaches of the policies, this will be referred to the category manager for review with the provider.

Training Staff

We require our staff to complete training and ongoing refresher courses on slavery and human trafficking. Our training covers:

- How to identify the signs of slavery and human trafficking.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the business.
- We will ensure that the issue of modern slavery is covered in all staff handbooks and the policy is published on internal noticeboards, websites and available on request.

This policy covers the period 01/04/24 – 31/03/25 and will be reviewed annually.

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Eastbrook Company

Date: 10/01/2026