

# Modern Slavery & Human Trafficking Statement

FINANCIAL YEAR ENDING 30 APRIL 2025



## Our Business

Scolmore, a British family-run business, is one of the UK's leading suppliers of electrical accessories, lighting, home automation, security and cable accessory products. From its headquarters in Tamworth, the Group is well positioned to design, develop, manufacture and distribute its product range nationally and internationally. The company is committed to harnessing the very latest technologies and developing superior performing, competitively priced products which allow installation projects to be completed quickly and easily.

Our Product Development Team are constantly tracking market trends, industry regulations and standards so that we continue to increase our product range to meet the ever-changing needs of our customers, while always considering the lifecycle of our products and their environmental impact throughout the product design process.

The Scolmore Group revolves around people, customers and the strong relationships built and maintained through consistent high levels of service and delivery. Our people are at the heart of our organisation, and we are committed to providing a supportive and inclusive environment that fosters growth, creativity, and collaboration.

## Organisation's Structure

The Scolmore Group is a group of companies consisting of Scolmore (International) Ltd, which is the highest parent, based in Tamworth, Staffordshire (United Kingdom) and the following wholly owned operative subsidiaries:



- Ovia Ltd, based in Tamworth, Staffordshire (UK),
- Elite Security Products Ltd (ESP), based in Redditch (UK),
- Unicrimp Ltd, based in Tamworth, Staffordshire (UK),
- Sangamo Ltd, based in Port Glasgow (UK),

- Scolmore International Electrical trading LLC based in Dubai,
- Scolmore International Middle East FZE based in Dubai,
- CLICK Scolmore Electrical and Lighting (Hangzhou) Co Ltd based in China,
- Lumen 8 Lighting Ltd based in Hong Kong.

## Our Supply Chains

We have established strong and long-lasting relationships with a mix of global market leading manufacturers and local (UK) SMEs.

Our tier one suppliers are based in:

- United Kingdom
- Ireland
- Germany
- Bulgaria
- India
- China
- Taiwan
- Vietnam

## Our Commitment

Over the course of the past 3 years, we have embedded the Ten Principles of the United Nation Global Compact into strategies and operations, and committed to respecting human and labour rights, safeguarding the environment, and working against corruption in all its forms.

Our dedication to responsible and ethical practices, fostering trust with stakeholders, promoting responsible decision-making, and encouraging a culture of honesty and respect, is outlined in our Code of Ethics.

## Our Policies on Slavery and Human Trafficking

Cascading down from our Code of Ethics, we have several policies and procedures specifically supporting our anti-slavery commitment. Please see below for an outline of some of these key policies.

### The Scolmore Group Code of Ethics



### The Supplier Code of Conduct

- outlines the expectations and standards we set for our suppliers in relation to social, environmental, and ethical practices.
- reflects our core values and the high ethical standards which inspire our employees, business partners and all other stakeholders.
- incorporates the ten principles of the UN Global Compact, as well as the OECD Guidelines for Multinational Enterprises.
- expresses our vehement opposition to slave and forced labour as well as underage labour defined by the ILO.

### The Anti-slavery and Human Trafficking Policy

- in accordance with the Modern Slavery Act 2015, reflects the universal standards crystallised in our Code of Ethics informing the way we conduct our business.
- is intended to give our employees, suppliers, contractors and other business partners guidance on Scolmore's approach to modern slavery and human trafficking; the measures we have taken in order to assess all potential modern slavery risks related to our business; the actions we have in place in order to ensure no slavery or human trafficking occur in our own business and supply chains.

### The Conflict Minerals Policy

- aims at reducing conflict through our sourcing decisions, while constructively engaging with our supply chain.
- outlines our commitment to conducting business in a responsible and sustainable way and requires the same of our workforce, suppliers, contractors and other business partners.

### The Sustainable Procurement Policy

- is based on our Code of Ethics as well as on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.
- is in accordance with the OECD Guidelines for Multinational Enterprises.

### The Whistleblowing Policy and Procedure

- supports a culture of openness and accountability, essential to prevent situations occurring or to address them when they do occur.

- encourages employees to report suspected wrongdoings as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- provides employees with guidance on how to raise those concerns.
- reassures employees that they should be able to raise genuine concerns in good faith without fear of retaliation, even if they turn out to be mistaken.

### **Business Partners Due Diligence**

To understand who our **Business Partners** are, and the degree of risk they present, we conduct an appropriate level of **Due Diligence** before entering in any trading relation with them.

The risk level is then periodically re-assessed during the course of our business relationship.

Each Business Partner is assigned a risk level dependent on different criteria like country of incorporation and/or operation, nature of the business (i.e. private vs. public), length of trading relationship, nature of the goods or services provided, business volume, and so on. Following checks - which might involve desktop checks, sanction screening, and so on - are based on a risk matrix.

### Social Audits

Since November 2023, existing quality audits have been coupled with social audits on our stock suppliers. Any non-conformities arising from these audits are being categorised in line with the Ethical Trading Initiative (ETI) Base Codes, adapted to our business model.

- Forced Labour
- Underage Labour
- Discrimination
- Environment
- Working Contracts
- Health and Safety
- Compensation
- Freedom Association
- Miscellaneous

Following a non-conformity, our Compliance and Procurement Team work directly with the manufacturing plant to drive resolution at root cause.

All audits are conducted by reputable third-party assessors. All prospect stock suppliers must address

any non-conformities before entering in a trading relation with Scolmore.

## Accreditations

### EcoVadis

As part of our commitment to society, our people and the environment, Scolmore Group completes a thorough assessment of its business sustainability practices every year through EcoVadis, a global leader in business sustainability assessments. The EcoVadis assessment includes 21 sustainability criteria across four core themes: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. In our latest rating, which was completed in November 2024, we earned a Bronze Medal, which places us globally in the top 35% of companies assessed by EcoVadis. This score reflects the quality of the company's sustainability management system and demonstrates a commitment to promoting transparency throughout the value chain.



### Supply Chain Sustainability School - Gold Membership

Scolmore is now a Gold member of the School. The resources within the School, in conjunction with other tools available to the Group, have helped with upskilling our Sustainability champions on general as well as specific construction industry related issues. Training conducted through webinars have inspired our sustainability strategy and journey by giving us a look-ahead to better understand the market and regulatory trends.

### UN Global Compact Participation

As part of our commitment to sustainable and responsible business practices, in April 2025 we have joined the *United Nations Global Compact* initiative - a voluntary initiative for the development, implementation and disclosure of responsible business practices.

The *UN Global Compact* is a call to companies everywhere to align their operations and strategies with *ten universally accepted principles* in the areas of human rights, labour, environment and anti-corruption, and to take action in support of *Sustainable Development Goals (SDGs)*.

## Processes for Preventing Slavery and Human Trafficking in Our Business

As an employer operating across multiple regions, we adhere to local employment laws and uphold stringent measures to prevent modern slavery within our business. These safeguards are continually evaluated and refined to drive ongoing improvements. Below is a concise overview of the internal processes and controls we have in place.

### Employees

We only recruit individuals with a legal right to work in the UK. All offers of employment are subject to the candidate providing the required original documents or our organisation being able to carry out a positive check on the Home Office 'online right to work checking service'. To enable us to conduct an online check, the candidate must have shared their right to work details using the Home Office 'prove your right to work to an employer' online service.

The requirement to provide evidence of the right to work in the UK applies to all new recruits, regardless of their race, nationality or ethnic or national origins.

Original identification documents are returned to the employee as soon as onboarding procedures are completed, whereas copies are retained in accordance with the data protection and other applicable regulations.

We engage only with reputable verified employment agencies to source labour on a temporary base.

### Awareness and Training

We are actively working to increase awareness around Modern Slavery.

We do so via our ScolmoreHub, the Group's intranet, but also via e-learning training modules available to all Scolmore's employees on the LMS platform.

In line with our commitment, all Managers and Directors as well as all staff working in Human Resources, Product Development, Quality, Technical, Procurement, Purchasing, Supply Chain, Projects and Legal & Compliance departments (as well as any other staff member who could come into contact with incidents of modern slavery during the performance of their duties) are required to complete a mandatory training module and are provided with tools enabling them to recognise and address any relevant signs.

All onboarding staff must complete the mandatory training within 6 months from the starting date.

## Suppliers' Adherence to Our Values

### Compliance with Laws

We expect all our suppliers to conduct their business consistently in compliance with the principles covered in our Supplier Code of Conduct (SCoC) as well as the laws and regulations applicable in the country they operate in. Should there be a conflict between our SCoC and the applicable laws and regulations, we expect our suppliers to meet the most stringent requirements.

Since its launch in July 2022, all strategic suppliers are encouraged to sign the Scolmore Supplier Code of Conduct. This has now become a mandatory requirement for all onboarding stock suppliers.

### Transparency

We aim to be transparent in our dealing with our suppliers and we expect our suppliers to be open and honest in their dealing with us.

## Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business or supply chains, we

intend to take the following steps to further combat slavery and human trafficking:

- Continue implementation of the new e-learning training module and maintenance of the high completion rate to ensure awareness of the risk of modern slavery in our Business.
- Continually review the panel of approved recruitment agencies for temporary workers, including sample auditing to further test the strength of the governance controls.
- Review and improve the controls around the approval and onboarding of new non-profiled suppliers.
- Continue to work with strategic suppliers to ensure agreement and adherence to the Scolmore Supplier Code of Conduct.
- Further expand the regularity and scope of the social responsibility audits on our first and second-tier supply chain.

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Signed:



Marie Parry

Group Chief Operating Officer on behalf of the board of Directors

Date: 30.06.2025

This statement, pursuant to section 54.1 of the Modern Slavery Act 2015 and constitute our Slavery and Human Trafficking Statement for the Financial Year ending 30.04.2025, and was approved by the Board of Director of the Scolmore Group on 30.06.2025.