Sustainability Statement

Building the foundations for a more sustainable future...

2025 highlights

Health and safety
Since 2021 lost time injury frequency rate has reduced by 16.3% and severity rate has reduced by 38.6%

Greenhouse gas emissions
40.3% reduction in absolute market-based GHG emissions vs 2021 base year

Supply chain due diligence
Launched EcoVadis Programme. 89.5% suppliers by spend undergone initial risk assessment with 15.9% suppliers by spend already completed EcoVadis Rating*

Waste management
99.2% waste diverted from landfill Δ

Talent
Developed Group-wide performance management process and system
More than 750 colleagues participating in government-funded training schemes

Human rights
Completed a human rights risk assessment and published human rights policy

Product safety and quality
Developed Group Principles on Product Safety and Quality

Circular economy
Acquired HSS Hire Ireland, championing the hire market for tools and equipment

Legislation
Prepared for EU Deforestation Regulation (EUDR), Carbon Border Adjustment Mechanism (CBAM) and Construction Products Regulation

Community
Over £1.7m donated to charities and good causes and over £1.0m raised by our colleagues and customers

* Spend excludes Salvador Escoda. These suppliers will be uploaded in phase 2 of the programme in 2026 as their sustainability onboarding is completed.

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CEO and CFO Introduction

Navigating a changing ESG landscape

In 2025, we built upon the significant progress achieved in 2024. Our ongoing commitment remained focused on material ESG topics, including health and safety, climate change, supply chain due diligence and diversity and inclusion.

Given the legislative backdrop in the European Union (EU) the Governance Committees including the Board and Executive Sustainability Committee have discussed important ESG legislation at length. The priority areas have been the EUDR and CBAM given the timescales and resourcing implications.

Although details and implementation dates for the legislations are evolving, we are confident that we have established robust programmes to ensure effective preparation.

Beyond the legislative landscape the Group has remained committed and focused on its sustainability strategy especially health and safety, climate change, supply chain due diligence and diversity and inclusion.

Our business leaders continue to embed health and safety into daily operations and advance our programme through targeted initiatives in our priority risk areas, including vehicle movements, safe deliveries, and the safe storage and handling of products. We are making progress towards our net-zero climate change targets. Our EcoVadis programme has been established and is overseen by our Governance Committees.

Significant improvements have been made in integrating sustainability throughout the organisation. Sustainability is embedded into finance, procurement, HR and risk governance groups. The sustainability structures around the Group have also been strengthened with business units bringing their expertise, insights and ideas together through our newly established Sustainability Forum.

We look forward to the impact that this forum will have as we continue our commitment and activity to build a more sustainable future.

Eric Born
Chief Executive Officer
4 March 2026

David Arnold
Chief Financial Officer
4 March 2026

This 2025 Sustainability Statement is structured using the European Sustainability Reporting Standards (ESRS) as a guide as we prepare to comply with the Corporate Sustainability Reporting Directive (CSRD) as per the legislative timeline. While we have used the ESRS as a guide, this 2025 statement is not compliant with the CSRD.

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General disclosures

General disclosures	Notes	Location
Basis for preparation	Report covers the 2025 financial year from 1 January 2025 to 31 December 2025. The scope of the report includes our operations in the Island of Ireland, Great Britain, Northern Europe and Iberia. EY has completed a limited assurance engagement over selected performance data.	The EY assurance statement can be found on page 69 and 70. Information within the scope of this assurance is indicated throughout the report with a Δ
Disclosures in relation to specific circumstances	Any divergence from the scope outlined in the basis for preparation notes above is indicated in the accounting notes presented next to each section.	
The role of the administrative, management and supervisory bodies	Information is presented in the Governance section.	Pages 67, 68 and 75
Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Information is presented in the Governance section.	Pages 67 and 68
Integration of sustainability-related performance in incentive schemes	Information presented in the Remuneration Committee Report.	Pages 87 to 111
Statement on sustainability due diligence	Core elements of our sustainability due diligence process include: • Double materiality assessment • Stakeholder engagement • Risk assessment and management • Governance on sustainability issues • Policies, actions, metrics and targets	 Pages 47 and 48 Pages 19 and 20 Pages 31 to 42, 50, 59, 60 and 67 Pages 67 and 68 Throughout the Sustainability Statement
Risk management and internal controls over sustainability reporting	ESG risk management is integrated into the Group risk management process.	Pages 31 to 42, 50, 59 and 67
Market position, strategy, business model(s) and value chain	Information presented in the Strategic Report and the value chain is presented in the Sustainability Statement.	Pages 3 to 9 and 49
Interests and views of stakeholders	Information presented in the Strategic Report.	Pages 19 and 20
Material impacts, risks and opportunities and their interaction with strategy and business model(s)	Materiality assessment, matrix and impacts, risks and opportunities (IROs) presented in the Sustainability Statement.	Throughout the Sustainability Statement
Description of the processes to identify and assess material impacts, risks and opportunities	Materiality assessment and matrix presented in the Sustainability Statement.	Pages 47 and 48
Disclosure requirements covered by the undertaking's sustainability statements	Disclosures presented throughout the Sustainability Statement.	
Actions and resources in relation to material sustainability matters	Disclosures presented throughout the Sustainability Statement.	
Metrics in relation to material sustainability matters	Disclosures presented throughout the Sustainability Statement.	
Tracking effectiveness of policies and actions through targets	Disclosures presented throughout the Sustainability Statement.	
Task Force on Climate-Related Financial Disclosures	TCFD-related content is clearly indicated throughout the report **TCFD**.	

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Sustainability at Grafton

Grafton's sustainability strategy has five priority areas that address ESG issues that are important to our business, colleagues and customers. The table on page 48 shows how different material impacts link to the five pillars of the Grafton sustainability strategy.

While we are not required to comply with the Corporate Sustainability Reporting Directive (CSRD) for 2025, our reporting is evolving in response to CSRD requirements to make it easier for stakeholders to navigate and to make reporting more comparable.

While European Sustainability Reporting Standard (ESRS) disclosures are referenced, this 2025 statement is not compliant with CSRD requirements.

Our strategy aligns with the eight UN Sustainable Development Goals that we can have the biggest impact on:

Our sustainability strategy is supported by our five priority areas:

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Materiality assessment

We carried out a preliminary double materiality assessment in 2023 in partnership with an external consultancy firm to identify our material impacts as well as ensuring that our strategy is focusing on the most important issues.

A double materiality assessment looks at sustainability issues through two lenses, the impact that a business has on society and the environment as well as the financial impact an issue may have on the business's performance.

This methodology aligned with the double materiality guidance published by the European Financial Reporting Advisory Group (EFRAG) in August 2023 taking into account the reporting requirements set out in the European Sustainability Reporting Standards (ESRS).

We carried out extensive stakeholder engagement across customers, colleagues, suppliers, large shareholders, lenders, internal subject matter experts and governance committees. Feedback was scored, weighted and presented in a materiality matrix showing Grafton's most material issues. The matrix was discussed and validated by the Board and then further refined and is presented on page 48.

In 2025 we reviewed and refined the risks and opportunities associated with our most material impact areas and the refined impacts, risks and opportunities (IROs) are presented in each section of the report. We plan to review our materiality assessment to incorporate business changes and the updated EFRAG guidance before we report against the CSRD for the 2027 financial year.*

* Subject to any further legislative changes.

Steps in double materiality assessment

Draft list of issues developed	Extensive research was conducted on Grafton and its peers. Initial consultation was held with key colleagues across the Group and a provisional list of material issues was drafted.
Assess importance of issues to business, society and environment	Surveys were carried out with customers, colleagues and suppliers. Interviews were carried out with large shareholders and lenders. Workshops were held with subject matter experts at Grafton.
Rank impacts	Impacts were assessed using a scale of 1 (very low impact) to 5 (very high impact) and ranked in order of importance.
Assess financial impact	Level of financial impact on business performance, profitability, growth and reputation was assessed using the 1 to 5 scale.
Present impact on matrix	Draft matrix was developed and shared with governance committees.
Validate and refine matrix in governance committees	Following the feedback received, the matrix was refined, issues were grouped, and the final matrix was presented and approved by the Board.
Impacts, risks and opportunities reviewed and refined	In 2025 we conducted a review of the impacts, risks and opportunities, resulting in further refinement. The updates were reviewed and approved by the Executive Sustainability Committee.

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Materiality assessment continued

Our top 11 material impact areas

1. Climate change
2. Equality, equity, diversity & inclusion
3. Product safety & quality
4. Colleague health, safety & wellbeing
5. Responsible sourcing in supply chains
6. Talent & reward
7. Resource use & circular economy
8. Sustainable raw material sourcing
9. Regulatory compliance
10. IT & cyber security
11. Privacy & data security

Materiality matrix

The matrix opposite presents the findings of the double materiality assessment. It displays Grafton's top 11 material impact areas. Impacts were assessed using a 1 to 5 scale. A materiality threshold was applied, impact areas above 2.5 on both axes were deemed material and presented in the matrix.
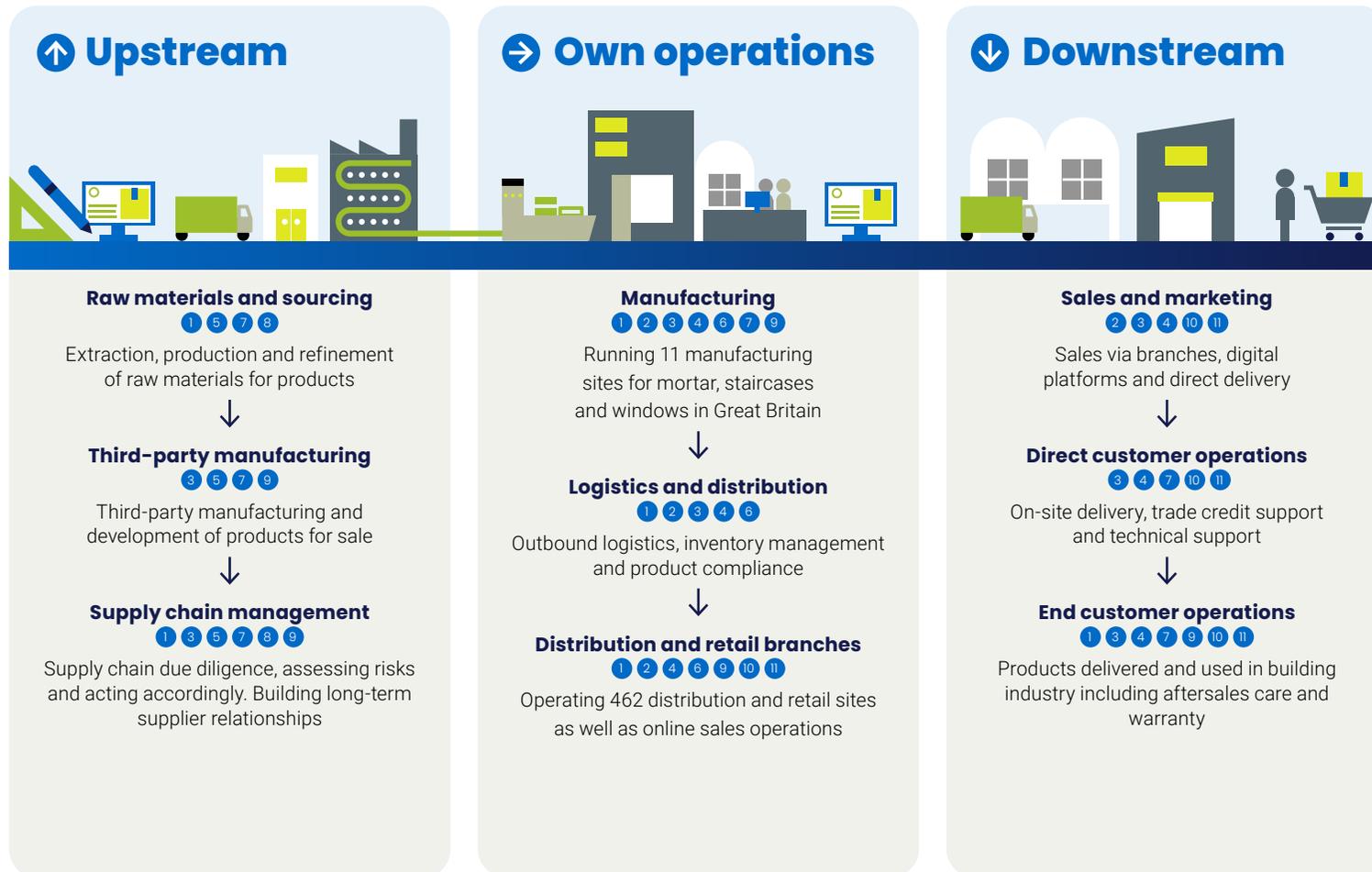

Linking material impacts to strategy

ESRS reference	ESRS topical issues	Strategy link	Subtopics	Disclosure reference
E1	Climate change	Planet	Climate change	Pages 51 to 55
E5	Resource use & circular economy	Customer & product	Resource use & circular economy	Pages 56 to 58
			Sustainable raw material sourcing	Page 57
S1	Own workforce	People	Equality, equity, diversity & inclusion	Pages 61 and 62
			Colleague health, safety & wellbeing	Pages 63 and 64
			Talent & reward	Pages 62 and 63
			Privacy & data security	Page 68
S2	Workers in the value chain	Customer & product and ethics	Responsible sourcing in supply chains	Page 65
S4	Consumers and end users	Customer & product and ethics	Health & safety*	Pages 63 and 64
			Product safety & quality	Page 66
			Privacy & data security	Page 68
			IT & cyber security	Page 68
G1	Business conduct	Ethics	Regulatory compliance	Pages 67 and 68
			IT & cyber security	Page 68
			Privacy & data security	Page 68

* Whilst customer health and safety was not specifically called out in the top 11 material impact areas our holistic approach to health and safety covers this important stakeholder group so it has been included as an area of disclosure.

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Our value chain

Our key business activities, stakeholder groups and value chain steps are set out in the diagram below. We have highlighted the relationships with our material impact areas. Our sustainability programme addressed the full value chain from raw material sourcing, to supply chain due diligence, operational emissions and waste, health and safety and customer engagement.

↑ Upstream

Raw materials and sourcing
(1) (5) (7) (8)

Extraction, production and refinement of raw materials for products

↓

Third-party manufacturing
(3) (5) (7) (9)

Third-party manufacturing and development of products for sale

↓

Supply chain management
(1) (3) (5) (7) (8) (9)

Supply chain due diligence, assessing risks and acting accordingly. Building long-term supplier relationships

→ Own operations

Manufacturing
(1) (2) (3) (4) (6) (9)

Running 11 manufacturing sites for mortar, staircases and windows in Great Britain

↓

Logistics and distribution
(1) (2) (3) (4) (6)

Outbound logistics, inventory management and product compliance

↓

Distribution and retail branches
(1) (2) (4) (6) (9) (10) (11)

Operating 462 distribution and retail sites as well as online sales operations

↓ Downstream

Sales and marketing
(2) (3) (4) (10) (11)

Sales via branches, digital platforms and direct delivery

↓

Direct customer operations
(3) (4) (7) (10) (11)

On-site delivery, trade credit support and technical support

↓

End customer operations
(1) (3) (4) (7) (9) (10) (11)

Products delivered and used in building industry including aftersales care and warranty

Material impacts

1. Climate change
2. Equality, equity, diversity & inclusion
3. Product safety & quality
4. Colleague health, safety & wellbeing
5. Responsible sourcing in supply chain
6. Talent & reward
7. Resource use & circular economy
8. Sustainable raw material sourcing
9. Regulatory compliance
10. IT & cyber security
11. Privacy & data security

Stakeholder groups across our value chain

| Customers | Colleagues | Communities and the environment | Shareholders | Suppliers |

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Environmental disclosures

It's estimated that buildings account for 40% of the energy usage across the EU and 36% of GHG emissions, which mainly stem from construction, usage, renovation and demolition. GHG emissions from material extraction, manufacturing of construction products, as well as construction and renovation of buildings are estimated to be 5-12% of GHG emissions TCFD.

As a result, all players in this sector have a responsibility to take action to reduce emissions and source materials responsibly and use them efficiently.

The stakeholder engagement carried out with customers, colleagues, investors, lenders and suppliers for our double materiality analysis showed that climate change and resource use and circular economy are important impact areas.

Environmental disclosures	**E1: Climate change** **E5: Resource use and circular economy**
Strategy linkage	**Planet** **Customer and product**
UN SDG	11 SUSTAINABLE CITIES AND COMMUNITIES / 12 RESPONSIBLE CONSUMPTION AND PRODUCTION / 13 CLIMATE ACTION / 15 LIFE ON LAND

Key: — Risk   + Opportunity
↑ Upstream   → Own operations   ↓ Downstream

Environmental impacts, risks and opportunities TCFD
The table below summarises Grafton's environmental IROs

ESRS Topical issue	Sub-topic	Impact	Value chain	Risks & opportunities
Climate change	**Climate change mitigation**	Scope 1, 2 & 3 GHG emissions.	→ ↓ ↑	— Transitional costs – investment in mitigation strategies such as energy efficiency, alternative technologies, renewable energy and alternative fuels. + Reduction in carbon emissions due to success of transition plan. — Financial costs related to carbon taxation.
Resource use and circular economy	**Resource use**	Extraction/harvesting and use of raw materials for manufacturing process including timber and aggregates.	↑	— Environmental, social, reputational and commercial impacts of unsustainable raw material sourcing.
	Raw material sourcing	Use of raw materials in products for sale to customers notably timber.	↑	— Failure to meet regulation related to forest-based commodities, notably timber.

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Environmental disclosures – E1 Climate change

TCFD

Business activity	Policy/approach	Metrics/targets
Climate Change	Environment Policy	Net-Zero Science Based Target

Actions
Own operations
Actions and plans

This year Grafton has remained focused on implementing initiatives that will reduce our GHG emissions to ensure progress towards our Science Based Targets Initiative targets.

Key decarbonisation levers for Scope 1 and Scope 2 are:

Electricity and energy savings
Grafton has increased its acquired renewable electricity by 4% in 2025 to a total of 92%. Business units continued to implement a range of efficiencies including energy management systems and equipment efficiencies.

This has been alongside our work on electrification of premises, moving away from fossil-fuel sourced heating such as natural gas and heating oil. Grafton continues to install Solar PV arrays across the estate, with ten new installations and the expansion of six existing arrays in 2025.

We produced over 2,800,000kWh of renewable electricity some of which was fed into the local grid.

We have continued to implement recommendations from the Energy Savings Opportunity Scheme which include a range of energy saving initiatives. Grafton will continue to implement initiatives before the next phase of the Scheme.

Vehicle fleet
In 2025, efforts to move to an alternative vehicle fleet continued with the increased uptake in BioCNG, Hydrotreated Vegetable Oil (HVO) and electric vehicles across the fleet.

HVO use in our commercial fleet increased by 22% compared to 2024, saving more than 2,000 $tCO_2 e$. Our UK-based businesses entered into a shared contract to increase HVO usage most cost-effectively. The transition to an alternatively fuelled vehicle fleet will continue as part of our transition plan, with increased uptake of HVO and move to electric vehicles where feasible across the fleet.

Value chain
Actions and plans
Data availability and accuracy
With over 99% of Grafton's emissions being indirect emissions generated in our value chain, the support of our suppliers and manufacturers will be essential to achieve our targets. Grafton worked to improve its Scope 3 calculation process in 2025 by improving the accuracy of purchasing and associated emissions factors as well as a focus on end of life treatment of products sold and emissions of products in their use phase. In conjunction with supplier engagement, Grafton plans to further improve the accuracy of value chain emissions. The introduction of CBAM to some of the markets within which Grafton operates has improved the accessibility of carbon data provided by our suppliers.

Supplier engagement
Our work with EcoVadis will provide a route to engage with suppliers on their environmental performance including climate change.

We continue to partner with manufacturers to drive investment in low emission technologies and products. This is essential to decrease the emissions from goods we sell to our customers and the emissions the product may produce over its lifetime.

Focused examples
Businesses including Selco and Woodie's have highlighted the importance of the EcoVadis programme through their supplier conferences.

Isero maintained top-level CO_2 Performance Ladder certification in the Netherlands. The business has renewed this annually since 2017, reflecting Isero's commitment to cutting emissions across its operations and supply chain through transparent reporting and collaboration.

Salvador Escoda's air conditioning offer is important to support customers' climate change adaptation programmes. In 2025 Salvador launched a new training programme focused on solar energy, energy efficiency, and reducing carbon emissions. It offers technicians hands-on sessions, real-world examples and practical guidance to help professionals improve system design, performance and sustainable energy use.

Net-Zero Science Based Targets

The Science Based Targets Initiative (SBTi) has validated that the science-based greenhouse gas emissions reductions targets align to the SBTi Corporate Net-Zero Standard.

SBTi has classified Grafton's Scope 1 and 2 target ambition as in line with a 1.5°C trajectory:

Overall net-zero target: Grafton Group plc commits to reach net-zero greenhouse gas emissions across the value chain by 2050.

Near-term targets: Grafton Group plc commits to reduce absolute Scope 1 and 2 GHG emissions 48.5% by 2030 from a 2021 base year. Grafton Group plc also commits to reduce absolute Scope 3 GHG from use of sold products covering sold fossil fuels 42% within the same timeframe. Grafton Group plc further commits to reduce all other absolute Scope 3 GHG emissions 42% within the same timeframe.

Long-term targets: Grafton Group plc commits to reduce absolute Scope 1 and 2 GHG emissions 90% by 2050 from a 2021 base year. Grafton Group plc also commits to reduce absolute Scope 3 GHG emissions 90% within the same timeframe.

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Environmental disclosures – E1 Climate change continued

Transition plan (TCFD)

Grafton's climate transition plan follows the principles of the Transition Plan Taskforce disclosure framework – Ambition, Action, Accountability

Ambition
Foundations
Grafton's targets have been validated by the SBTi and are aligned with the 1.5°C trajectory (page 51). Our double materiality assessment showed that our stakeholders, colleagues, customers and suppliers regard climate change as a priority.

Grafton's business model and value chain are presented on pages 9 and 49. As a distributor and retailer of materials for the building industry there are important changes that will need to take place over the coming 25 years.

To drive the changes that are needed, Grafton will work extensively with suppliers and customers. In the shorter term we will focus on improved data collection, increasing the proportion of suppliers with Science-Based Targets and encouraging more suppliers to set targets with support from EcoVadis.

In the longer term there will be a focus on alternative products, materials and energy usage for products as well as scaling up circular business models where possible.

Key assumptions and external factors
Financial growth
The targets are based on absolute emissions reductions therefore organic business growth will be captured in the emissions reduction trajectory. However, as a business that acquires and divests, we have published a recalculation policy to account for any significant changes in the business (www.graftonplc.com).

Policy developments
All businesses require policy support to enable them to deliver such stretching targets. It will be important that governments continue to drive renewable electricity, support innovations in alternative fuels and phase out high impact products such as natural gas and oil boilers.

Industry innovations and developments
We rely on large industries such as chemicals, steel and cement to provide the products that customers such as builders, DIY enthusiasts and developers need. These large industries have plans in place to reduce their emissions and have been subject to legislation, therefore delivering their ambitions will be an important contributor to Grafton achieving our targets.

Technological advancements
Longer term, technological advancements will be necessary in how buildings are constructed and the technology used to power them as well as in the transport industry for heavy goods. We will work with our supplier partners where possible to trial and promote these technologies, but much of the innovation will take place within our supply chain.

Data improvements
As a business Grafton sells hundreds of thousands of products therefore the calculation of Scope 3 emissions is subject to assumptions. As Grafton improves the monitoring of its emissions and suppliers improve the quality of their data, we will likely need to recalculate our emissions.

In 2025 our base year recalculation to account for key acquisitions and divestments was approved in line with our base year recalculation policy.

Scope 1 & 2 transition plan

Heating and cooling
Initial focus on increased efficiency and long-term transition to alternative forms of heating.

Commercial vehicles and plant
Phased transition to electric, bio-fuels or other alternative technology in the long term.
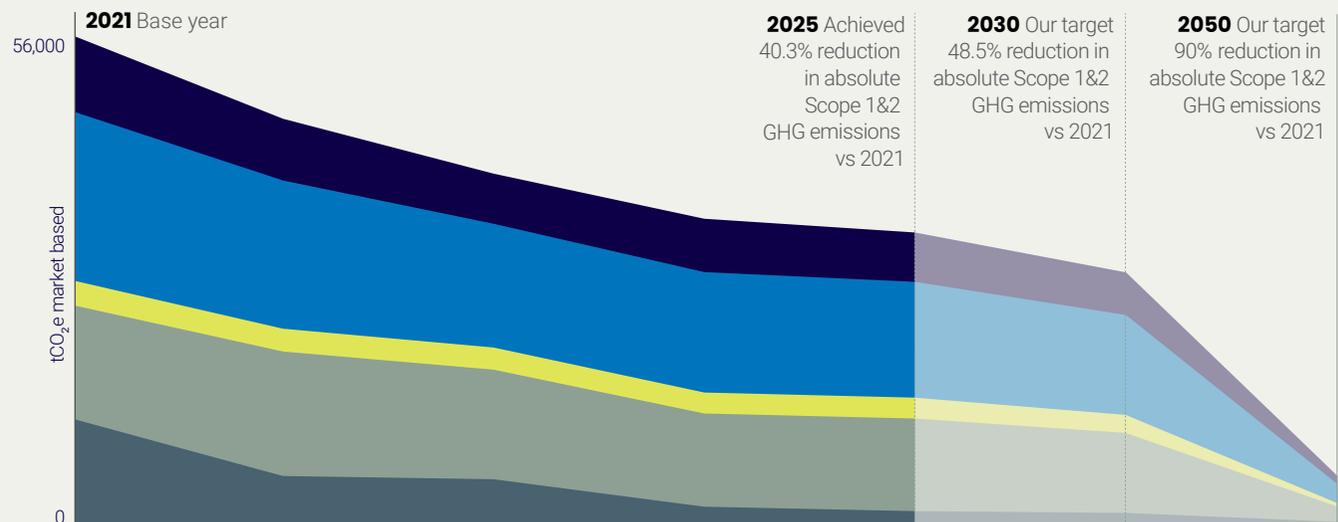
Car fleet
Switch to alternative fuels and support this move with the installation of charging points.

LPG
Initial focus on increased efficiency in manufacturing process and long-term working with suppliers to develop technological/efficiency innovations.

Electricity
Move to 100% certified renewable energy and increase solar production capacity for new and existing sites. Continue to improve monitoring of our energy use and increase efficiencies.

2021 Base year — 56,000 — tCO$_2$e market based — 0

2025 Achieved 40.3% reduction in absolute Scope 1&2 GHG emissions vs 2021

2030 Our target 48.5% reduction in absolute Scope 1&2 GHG emissions vs 2021

2050 Our target 90% reduction in absolute Scope 1&2 GHG emissions vs 2021

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Environmental disclosures – E1 Climate change continued

Action

Implementation strategy

The Executive Sustainability Committee ensures that GHG emissions targets are embedded in the business planning and operations of the business. In 2025, the Committee was engaged on the actions needed to meet our targets and approved the recalculation of our base year to account for acquisitions and divestments.

Our priority areas are displayed in the infographics on pages 52 and 53. The actions are separated into Scope 1 and 2, and Scope 3 so that the relevant teams across each business unit can take ownership for the delivery. Grafton includes climate change in the budgeting process to ensure that financial impacts of decisions are effectively quantified.

Engagement strategy

Engagement across Grafton's value chain and especially with suppliers and customers is an essential part of achieving the targets. Suppliers will be required to share detailed data on the products supplied and be encouraged to set science-based targets. Collaboration to bring new products to market will also be key.

Grafton's supply chain due diligence process will be extended to capture more detailed information on GHG emissions.

Grafton collaborates across the industry through groups such as the Builders Merchants Federation and Euro-Mat. These forums provide an opportunity for information and views to be shared with other building materials distributors, suppliers, and leading industry figures. As part of our sustainability strategy, we consult key stakeholders including customers, suppliers, shareholders and lenders. This is used to gain feedback on their priority areas and the actions that they would like to see Grafton taking.

Training of colleagues

The Group sustainability team communicate extensively with colleagues on climate change, targets and reduction strategies. In 2025, training for commercial colleagues has taken place as well as engagement at the Board, Executive Sustainability Committee and individual business unit reviews.

Accountability governance

Climate change governance follows the sustainability governance process set out on page 67.
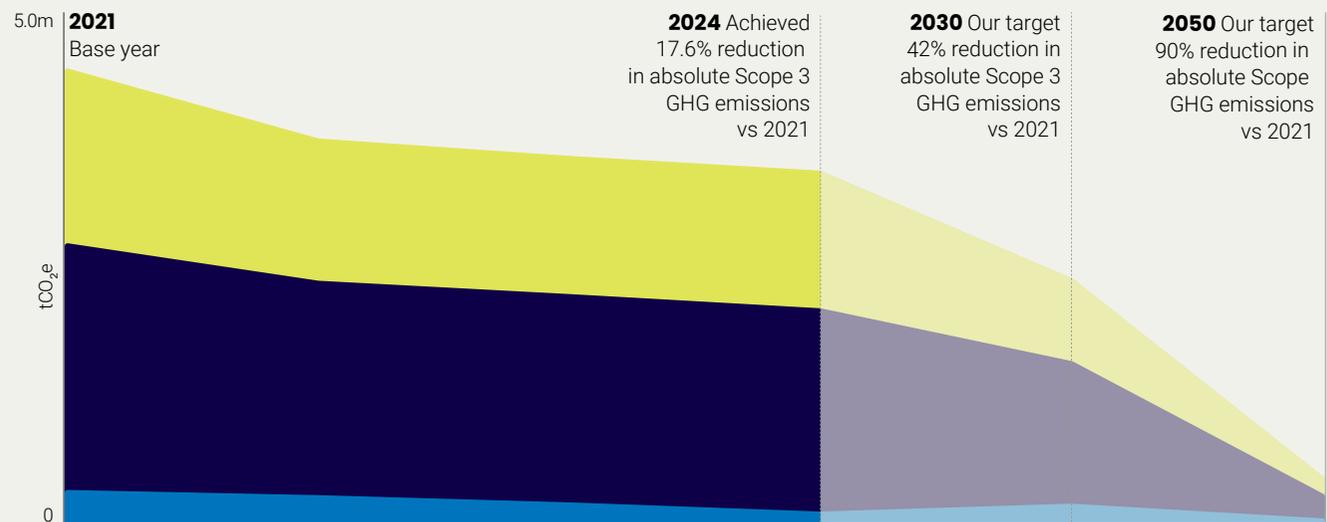
Scope 3 transition plan

Goods for resale
- Increase proportion of products sourced from suppliers with science-based targets.
- Prioritise reductions in categories that make the biggest contributions.
- Collate accurate product level emissions data from Environmental Product Declarations or other Life-Cycle Analysis.
- Increase circular business offering to decouple sales from emissions.

Use of sold products
- Offer alternatives to energy intensive products such as natural gas and oil boilers.
- Improving efficiency of energy using products as well as reducing emissions associated with use through increased renewables in the grid.

Other

2021
Base year

2024 Achieved
17.6% reduction
in absolute Scope 3
GHG emissions
vs 2021

2030 Our target
42% reduction in
absolute Scope 3
GHG emissions
vs 2021

2050 Our target
90% reduction in
absolute Scope
GHG emissions
vs 2021

5.0m

tCO_2e

0

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Environmental disclosures – E1 Climate change continued

Greenhouse gas emissions reporting `TCFD`

Scope 1 & 2	Unit	2021 base year	2024	2025	Change on 2024	Change on base year
Scope 1*	tCO$_2$e	42,380.7	32,427.8	31,453.4	-3.0%	-25.8%
Commercial vehicles	tCO$_2$e	15,312.8	12,202.3	11,821.6	-3.1%	-22.8%
Gas heating	tCO$_2$e	7,205.6	5,160.5	5,149.7	-0.2%	-28.5%
Manufacturing (LPG)	tCO$_2$e	12,982.4	10,648.9	10,579.7	-0.6%	-18.5%
Scope 2 – location-based	tCO$_2$e	14,868.0	10,820.0	10,010.9	-7.5%	-32.7%
Scope 2 – market-based*	tCO$_2$e	13,427.2	2,432.9	1,836.8	-24.5%	-86.3%
Electricity	tCO$_2$e	12,019.1	1,963.4	1,457.2	-25.8%	-87.9%
District heating	tCO$_2$e	1,408.1	469.5	379.6	-19.2%	-73.0%
Scope 1 & 2 – location-based	tCO$_2$e	57,248.6	43,247.9	41,464.4 Δ	-4.1%	-27.6%
Scope 1 & 2 – market-based	tCO$_2$e	55,807.8	34,860.7	33,290.2 Δ	-4.5%	-40.3%
Scope 1 & 2 – market-based intensity**	tCO$_2$e/£m Revenue	22.3	14.4	13.1	-9.3%	-41.4%

*   Major sub-categories of Scope 1 and 2 data presented in the table. Additional contributions from electric vehicles, forklift trucks and fugitive emissions are incorporated in the totals.

** Intensity is calculated using GHG emissions on a like for like basis to align with revenue data.

Scope 3	Unit	2021 base year	2023	2024	Change on 2023	Change on base year
Scope 3	tCO$_2$e	4,798,277.9	4,051,012.0	3,953,169.1	-2.4%	-17.6%
Goods for resale	tCO$_2$e	1,399,155.4	1,363,987.6	1,083,806.4	-20.5%	-22.5%
Use of sold products	tCO$_2$e	2,786,767.9	2,316,163.3	2,677,118.6	15.6%	-3.9%
Other categories	tCO$_2$e	612,354.7	370,861.1	192,244.1	-48.2%	-68.6%

Energy consumption

	Unit	2024	2025	% of total energy consumption
Energy consumption	Mwh	192,164.1	193,209.2	100.0%
Fossil fuels	Mwh	145,286.8	141,408.6	73.2%
Renewable sources	Mwh	46,877.2	51,800.6	26.8%
Fuel	Mwh	7,207.8	8,795.0	4.6%
Self-generated	Mwh	883.4	1,518.0	0.8%
Acquired	Mwh	38,786.1	41,487.6	21.5%

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Environmental disclosures – E1 Climate change continued

Accounting principles GHG emissions

We report our emissions as per the methods set out in the GHG Protocol. Under the GHG Protocol, emissions are categorised into Scope 1, 2, and 3.

We report our emissions in tCO_2 e and on emissions from all entities over which we have operational control. Please see our 'Scope 1 and 2 GHG Criteria' and 'Scope 3 GHG calculation methodology' available at graftonplc.com.

Grafton states that recalculations to the base year may occur given our business model. For more detail, please see 'GHG Recalculation Policy' available at www.graftonplc.com.

Between 2024 and 2025, Grafton completed the acquisitions of HSS Hire Ireland and Salvador Escoda and the divestment of MFP. In line with the GHG Protocol and our operational control approach, emissions associated with these changes have been updated in our Scope 1, Scope 2 and relevant Scope 3 categories from the date on which operational control was obtained or relinquished. As the combined impact of these acquisitions exceeded the materiality threshold defined in our GHG Recalculation Policy, we have undertaken a base year recalculation to ensure comparability of performance over time. Where full-year energy and emissions data was not available, we have applied estimation methodologies consistent with our GHG Calculation Criteria. Integration of both entities into Group-wide emissions management and data systems is ongoing and will further enhance data quality and consistency for future reporting periods.

Scope 1 emissions

Direct GHG emissions from operations. This includes emissions from our vehicle fleet, fugitive emissions, combustion of fuels for heating and manufacturing processes.

Scope 2 emissions

Indirect GHG emissions from electricity, heat and steam, purchased and consumed by Grafton Group. Location-based emissions are based on national grid average emission factors for defined locations. Market-based Scope 2 emissions refer to indirect GHG emissions associated with purchased electricity, heat and steam through procurement of contractual instruments such as Energy Attribute Certificates and Guarantees of Origin from sources such as wind, hydro, solar and biomass. For sites without such contractual agreements and for other Scope 2 energy types in the absence of supplier specific emission factors and/or residual mix emission factors, the national average emission factor has been applied.

Total energy consumption from fossil sources

Primary energy consumption from crude oil petroleum products, and natural gas, as well as consumption of externally purchased secondary non-renewable energy such as electricity, heat, steam and cooling. Energy consumption is based on meter readings and/or invoices. Considering the ESRS requirements, we have widened the scope of the total energy consumption metric to include all entities under operational control, including fuel consumption in leased vehicles.

Total energy consumption from renewable sources

Wood, biogas and externally purchased electricity from renewable sources, such as wind, solar, hydropower, biomass or biogas, as defined in the contractual agreements. Consumption is based on meter readings and/or invoices and complemented with data on renewable energy certificates for each site.

GHG intensity

Total GHG emissions per million net revenue. For the purpose of disclosing GHG emissions intensity (tCO_2e per £m revenue), Grafton Group uses a second set of market-based Scope 2 emission factors to ensure alignment between the emissions data and the financial information presented in each year's Annual Report and Accounts (ARA). While the Group's GHG Recalculation Policy requires restatement of historical emissions when structural changes occur—such as acquisitions or divestments—our financial reporting does not retrospectively restate prior-year turnover for such changes and only reports comparative figures for the previous two years.

To ensure consistency between the numerator (GHG emissions) and denominator (net revenue) in each reported intensity metric, the carbon values used for intensity calculations are aligned to the financial reporting boundaries and turnover figures published in the ARA for that specific reporting year.

This approach ensures that GHG intensity values remain comparable with the financial information reported to shareholders and are consistent with the methodology applied by the Group Finance function. It also ensures that intensity ratios accurately reflect operational performance in the period to which the financial statements relate.

Scope 3 emissions

We report our Scope 3 emissions using the following Scope 3 accounting principles:

- Relevance – Our Scope 3 inventory contains Goods for Resale, Goods Not for Resale, Use of Sold Products, Capital Goods, Operational Waste, Fuel and Energy Related Activities, Upstream Transport and Distribution, Downstream Transport and Distribution, Processing of Sold Goods, Business Travel, Employee Commuting, Downstream Leased Assets, End of Life Treatment.
- Completeness – Our Scope 3 inventory reflects our GHG emissions appropriately. Upstream Leased Assets, Franchises and Investments are not relevant for Grafton and are therefore excluded from the inventory.
- Consistency – We have calculated our Scope 3 emissions for 2021, 2022, 2023 and 2024 with consistent methodologies and reporting boundaries. This lends us to performing trend analysis and monitoring emission reduction progress over time.
- Transparency – Our Scope 3 methodology and assumptions can be found at www.graftonplc.com.
- Accuracy – During the calculation process, source data undergoes quality checks and calculations are reviewed by a third-party consultancy firm to ensure credibility in the end emission analyses.
- The latest data for Scope 3 is 2024 due to the complexity of the calculation.

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Environmental disclosures – E5 Resource use and circular economy

Careful resource management is central to our sustainability programme. Our focus areas include operational waste management, packaging, raw material sourcing and circular business models.

Business activity	Policy/approach	Metrics/targets
Operational waste	Environment Policy	• Tonnes operational waste • Operational waste diverted from landfill • Operational waste recycled
Packaging	Approach specific to operational market	• Report packaging data as per regulations
Raw material sourcing: timber	Deforestation Policy	• Timber certified through internationally recognised schemes • Due diligence processes in place in all relevant business units
Manufacturing: raw material use	Deforestation Policy Supplier engagement	• Timber certified through internationally recognised schemes • Restoration plans in place for aggregate sites
Circular business models	Approach specific to each business unit	• Pilot circular business opportunities by 2025 • Promote products to customers with sustainability attributes by 2030

Operational waste

Grafton works with waste management companies to monitor waste, manage it responsibly and look for opportunities to reduce it.

In partnership with our waste management companies, teams work to divert the waste in our own operations from landfill and in 2025 achieved a 99.2% diversion rate Δ. In addition, 58.8% of our operational waste was recycled.

We continue to look for opportunities to replace plastic wrap used to distribute products with recycled alternatives as well as trying to reduce the amount used where possible by using collapsible boxes, moving to cages or strapping products together. However, all alternatives need to be carefully assessed with our colleagues' safety in
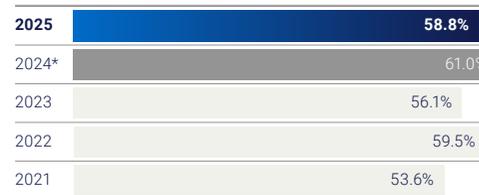
mind as many of our products are heavy and safety is of the utmost importance.
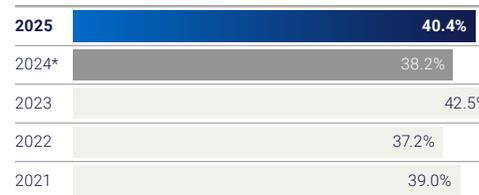
Accounting principles
Operational waste includes all waste generated in our operations. The data is collated via third-party reports from waste providers detailing disposal methods of waste streams.
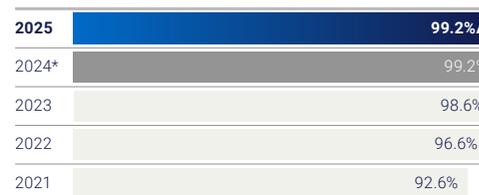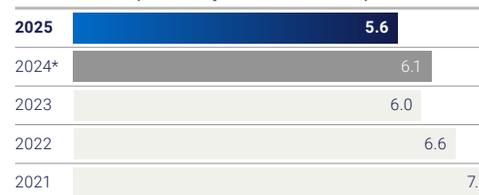
Operational waste data

Total recycling rate

2025	**58.8%**
2024*	61.0%
2023	56.1%
2022	59.5%
2021	53.6%

Total recovery rate

2025	**40.4%**
2024*	38.2%
2023	42.5%
2022	37.2%
2021	39.0%

Waste diversion from landfill

2025	**99.2%Δ**
2024*	99.2%
2023	98.6%
2022	96.6%
2021	92.6%

Total waste (tonnes per £m revenue)

2025	**5.6**
2024*	6.1
2023	6.0
2022	6.6
2021	7.3

Packaging data

All businesses report packaging data as required by legislation in their country of operation. The biggest change to this system has been taking place in the UK, where business units have continued to report against the existing packaging scheme and plastics tax regulations as well as the new extended producer responsibility system.

Business units have been working closely with suppliers to collect the data required on packaging.

Businesses based in the EU are also preparing for the Packaging and Packaging Waste Regulation which introduces rules and standards related to the packaging put on the market.

* Restated to include data for Salvador Escoda which was acquired in Q4 2024.

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Environmental disclosures – E5 Resource use and circular economy continued

Raw material sourcing

Gaining greater traceability of priority raw materials is an important focus. Timber is a key raw material for a number of the distributors within the Group and for StairBox.

The Group Deforestation Policy outlines the legal requirements, responsible sourcing and due diligence guidelines related to purchasing of forest based commodities, timber in particular. This policy is available at www.graftonplc.com.

In 2025 the focus has been on preparing for the EU Deforestation regulation. Identifying products in scope, reaching out to suppliers, planning the IT systems needed to monitor data and establishing the formal due diligence processes required to meet the requirements.

Business units across the Group have been sharing knowledge and best practice and significant work has taken place to monitor the changing requirements of the legislation.

Business units have also continued to promote the certification of the products sold through internationally recognised certification schemes.

Percentage of Selco timber certified to internationally recognised standards in 2025

99.0%

Percentage of StairBox timber certified to internationally recognised standards in 2025

99.6%

Across the Group we have achieved 90.9% of timber certified either with full chain of custody or supplier declared. This is less than our 100% target, but the priority for 2025 has been preparing for the deforestation regulation. We have plans in place to increase this percentage further in 2026.

Raw materials for manufacturing

Our manufacturing businesses produce ready mix and bagged mortar products, bespoke staircases and windows. The manufacturing process is different, but the processes have been developed to minimise wastage, source raw materials responsibly and produce quality products that are made to last.

Mortar manufacture

CPI EuroMix operates ten manufacturing sites across Great Britain sourcing cement, sand and additives from trusted suppliers to produce the product and their manufacturing processes follow the following standards:

- ISO 9001: Quality Management System
- ISO 14001: Environmental Management System
- BES 6001: The Framework Standard for Responsible Sourcing.

Attaining these certificates demonstrate CPI EuroMix's commitment to providing high-quality products using raw materials that are sourced responsibly and following a manufacturing process designed to minimise impact on the environment. CPI EuroMix received an 'Excellent' performance rating for their BES 6001 certification and use this framework when considering new suppliers. CPI EuroMix has been certified against ISO 9001 and ISO 14001 since 2016, and through regular auditing across all locations and regularly reviewing internal management systems maintain high-quality product manufactured responsibly. CPI EuroMix has also worked with their cement suppliers over time to ensure that GHG emissions associated with this raw material are reduced and the sand suppliers have strong restoration plans in place for all extraction sites.

Wooden staircase and window manufacture

StairBox uses state-of-the art technology to design and manufacture made-to-measure products. This ensures that minimal waste is generated in the installation of the product. Their sales teams have extensive training to support customers to design the products to the correct specifications.

StairBox operates a series of quality inspections throughout the manufacturing process, prior to a final full quality sign-off prior to loading and delivery. They have a chain of custody timber sourcing process to ensure that the timber used is responsibly sourced. 99.6 % of StairBox timber is certified by internationally recognised timber certification schemes. The certification process provides confidence that timber sourcing is not contributing to illegal deforestation, that strong labour standards are met.

The chain of custody audit ensures full traceability of all materials from initial source to end user as well as checking policies and procedures.

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Environmental disclosures – E5 Resource use and circular economy continued

Circular business models

Our business units are investigating and trialling different circular business models. They fall into a number of categories.

TCFD

1. Products as a service

In May 2025 Grafton completed the acquisition of HSS Hire Ireland. This is a tool and equipment hire specialist operating from four branches and four customer distribution centres in the Republic of Ireland. HSS Hire Ireland offers an extensive range of conventional hire products as well as specialist equipment.

This acquisition builds on our existing rental business models which include Sam Hire in the Republic of Ireland, TG Lynes plant rental service and Selco's partnership with HSS Hire in Great Britain.

2. Sale of spare parts

Spare parts and rental offerings have been central to the IKH business model for over 20 years. Spare parts are offered for tools, large machinery and tractor models. Maintenance and repairs of rental products are performed in-house, maximising the life of each product.

3. Take-back schemes

All of Selco's branches now have a pallet collecting scheme. Pallets from 32 branches along with cardboard and soft plastics are taken to a central distribution centre to be repaired or reused by a third party. For the remainder of the estate, Selco uses another partner organisation that collects, repairs and reuses the pallets. This process ensures that all plastic wrap is recycled rather than sent to landfill. Our Netherlands businesses, Isero and Polvo, have a strong focus on battery recycling and tool repairs. Both businesses have collection points in every branch for customers to take used batteries, which are collected by a third-party and recycled. Polvo offer a service whereby customers can take tools to their local branch to be repaired instead of being taken to landfill.

4. Repair & maintenance

Isero is innovating in the refurbishment space by working with one of their value chain partners on a sanitary ware refurbishment scheme collecting, refurbishing and reselling certain products and working to calculate the associated GHG emissions savings.

Additional environmental disclosures

Water management

Water is not a material issue within Grafton's operations as the branches and manufacturing facilities are not large users of water. However, Grafton is monitoring its water usage to ensure that this resource is used as efficiently as possible.

Biodiversity

There are various initiatives in place across the Group that are designed to address biodiversity as well as other environmental issues. Branches work to support and promote biodiversity at a local level. Chadwicks for example is a member of the All-Ireland Pollinator Plan implemented by the National Biodiversity Data Centre. As part of this membership, biodiversity projects are introduced to stores during refurbishments.

The Group's timber sourcing programme promotes responsibly sourced timber including internationally recognised certification which are tackling deforestation. We have a commitment to work with our aggregate suppliers to ensure that all extraction sites have restoration plans in place. CPI EuroMix has engaged with all of its quarries on this topic.

In 2026 we intend to introduce cleaning materials and other products used in our operations that are 100% bio-degradable.

Pollution

Grafton's manufacturing businesses have policies and procedures in place to monitor, manage and minimise emissions associated with the manufacturing process. CPI EuroMix has 'baghouse' technology on all sites which collects dust, and removes particulate matter and harmful gases from the manufacturing process. StairBox uses a bag filter to collect and store dust in a silo which is regularly maintained.

There are alarms installed to alert the teams in the case of a breach of the limits as well as a response plan in place. For the distribution businesses, air quality management associated with the fleet is important. Selco has invested in CNG fuelled vehicles in metropolitan areas as they emit lower amounts of particulate matter than standard diesel fuelled vehicles.

Grafton EcoVadis rating

SILVER | Top 15%
ecovadis
Sustainability Rating
SEP 2025

For the second year Grafton Group achieved Silver for our EcoVadis ESG ratings assessment which is in the top 15% of responders.

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Social disclosures

As a European multinational distributor of construction related products and solutions, we interact with people through our value chain: our colleagues, our suppliers and our customers.

Our colleagues are integral to our success as a business and we are committed to fostering an environment where everyone can thrive. Our people initiatives prioritise safety, wellbeing (including mental wellbeing), inclusivity, and professional development and are supported by comprehensive policies.

Supply chain risk management is a priority for the Group, and we understand the importance of effective management of the social impacts in our supply chain.

Engaging effectively with our customers is essential for the success of our business. We listen to their ideas, concerns and respond to provide the best service we can.

Social disclosures	**S1: Own workforce** **S2: Workers in the value chain** **S4: Consumers and end users**
Strategy linkage	**People** **Customer and product** **Ethics**
UN SDG	3 GOOD HEALTH AND WELL-BEING 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES

Social impacts, risks and opportunities
The table below summarises Grafton's social IROs

Key:
- ➖ Risk
- ➕ Opportunity
- ⬆️ Upstream
- ➡️ Own operations
- ⬇️ Downstream

ESRS topical issue	Sub-topic	Impact	Value chain	Risk/opportunity
Own workforce	**Equality, equity, diversity and inclusion**	A diverse and inclusive culture with strong colleague engagement results in colleague attraction and retention.	➡️	➖ Lack of diversity and inclusion within the workforce, including at senior levels, and a failure to provide equality and equity in the treatment of colleagues with respect to protected characteristics and mental wellbeing, can adversely affect retention and recruitment and may also result in non-compliance with relevant legislation. ➕ A diverse and inclusive culture, combined with strong colleague engagement and programmes that support overall wellbeing, including mental wellbeing, will attract potential colleagues and help motivate existing ones.
	Talent	Attracting talent and developing our existing colleagues to drive their careers and deliver business performance.	➡️	➖ Inadequate recruitment practices and ineffective training, development, engagement, pay and reward programmes, may result in retention challenges and negatively affect the Group's ability to attract, recruit and retain talent. ➕ Clear career pathways, compelling employer brands in our businesses, and robust succession planning across the Group are critical drivers of talent attraction, retention, and sustained business growth.
	Reward	Pay, benefit and reward packages for colleagues.	➡️	➖ Lack of competitive pay, comprehensive benefits and fair reward packages, including paying below competitors and offering unequal compensation, can hinder the ability to attract and retain talent and may negatively affect colleagues' mental wellbeing and performance. ➕ Offering competitive pay, benefit and reward packages and being transparent on gender pay will result in attraction and retention of top talent and a diverse workforce.
Workers in the value chain	**Responsible sourcing in supply chains**	The working conditions of people through the supply chain and adhering to all associated regulations.	⬆️	➖ Working with trading partners whose activities result in negative environmental or social impacts. Failure to have in place a strong due diligence process that meets regulations and protects the environment and people through the supply chain.

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Social disclosures – Social impacts risks and opportunities continued

ESRS topical issue	Sub-topic	Impact	Value chain	Risk/opportunity
Consumers and end users	**Product safety and quality**	The quality and safety standards of the products we sell impacts our customers and end users and the commercial success of our business.	⬇	⊖ Inadequate product safety standards and quality assurance processes could result in the sale of unsafe or poor quality products which may impact reputation, put customers at risk and lead to lost sales.
Own workforce and consumers and end users	**Data privacy and data security**	Loss of colleague and customer data impacts trust and commercial success.	➡ ⬇	⊖ Poor security and privacy controls over customer and colleague data may lead to data breaches which negatively impact customer and colleague trust and result in colleague retention issues and loss of customers. Failure to comply with data protection regulation.
	Health, safety and wellbeing	Potential accident and injury of colleagues going about their work and customers using our facilities.	➡	⊖ Risk of personal injury or loss of life of colleagues, suppliers, customers or members of the public during branch operations (including delivery) due to unsafe working practices. Failure to comply with health and safety regulation.
				⊖ Insufficient attention to colleague safety and wellbeing, including mental health, may lead to underperformance or retention issues, and an increased risk of regulatory non-compliance.

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Social disclosures – S1 Own workforce

The Group Chief Human Resources Officer, along with HR leaders in each business unit, ensure the effective delivery and promotion of colleague initiatives across each of our businesses. The Group-wide HR Forum serves as a platform to collaborate and share best practice, and monitors key metrics to ensure continuous improvement. Unless otherwise stated, our disclosures are applicable to all colleagues across the Group. Certain initiatives and programmes are tailored to meet the requirements of each local operational market.

Business activity	Policy/approach	Metrics/targets
Equality, equity, diversity and inclusion	• Group Equality, Equity, Diversity and Inclusion Policy • Human Rights Policy • SpeakUp Policy	• Alignment with FTSE Women Leaders Review on gender diversity and the Parker Review on ethnic diversity • Percentage increase in the number of females in a defined senior management group • Year-on-year increase in the number of females across all levels in our businesses • Engagement surveys at least every two years • Monitoring equal pay and a robust grading structure
Talent	• Group-wide performance management process and system with talent management capability selected	• Talent metrics in development • Average hours of training per colleague annually which is measured at business unit level
Reward	• Reward incentives across the Group and in business units are designed to drive high performance • Variable pay rewards outstanding achievement and commitment	• Compliance with EU pay transparency legislation • All colleagues receive at least 1% above the local national minimum wage
Colleague health, safety and wellbeing	• Health and Safety Policy, Risk Assessments and Safe Systems of Work • Wellness at Work Policy	• Lost time injury frequency rate • Lost time injury severity rate

Equality, equity, diversity and inclusion

We strive to create a workplace where everyone feels valued, respected, and empowered to contribute. The Board receives regular updates on the progress of our equality and diversity initiatives. Our Group-wide Equality, Equity, Diversity and Inclusion Policy ensures a consistent approach across the entire business. Diversity and inclusion working groups assist our businesses to foster an inclusive culture. Our objective is to maintain a workforce that represents the communities in which we operate.

All our colleagues are expected to support diversity, promote fair and respectful treatment of everyone, challenge unacceptable behaviours and must comply fully with all legislation relating to equality and diversity in their location.

Fair recruitment processes

We have objective and robust processes for recruitment and selection in each of our businesses.

Preventing workplace harassment

Each of our businesses has a Dignity at Work Policy to help colleagues identify potential bullying and harassment and to provide them with resources to address these issues should they arise. In our UK businesses, we have implemented measures to ensure all stakeholders are informed of our policy of zero tolerance on third-party harassment. Many of our businesses have specific women's groups and inclusion networks to ensure that the views of all colleagues are captured and to drive our diversity agenda.

Our businesses support and leverage the expertise of a wide range of organisations focused on increasing equality, diversity and inclusion. Grafton is a signatory to The Social Mobility Pledge, and is also a member of the Valuable 500. CPI EuroMix is a platinum member of Women into Construction which promotes gender equality in construction.

Promoting diversity in leadership

We were very pleased to increase the number of women in senior management from 32% in 2024 to 38% in 2025. This progress reflects our commitment to fostering an inclusive workplace that values diverse perspectives and promotes equal opportunities for all colleagues. We have implemented recruitment strategies to attract a diverse pool of candidates. Additionally, our benefits programmes have been expanded to support work-life balance and overall wellbeing in line with our Wellness at Work Policy. Our inclusion networks and colleague forums offer opportunities for colleagues to actively contribute to our diversity initiatives.

Promoting the inclusion of colleagues with disabilities

We are committed to fostering an inclusive and safe workplace and promoting psychological safety. We make necessary adjustments to our physical environment to support colleagues with disabilities, ensuring that all colleagues can work in a secure and accessible setting. We are committed to ongoing improvement in this area, ensuring that our workplace complies with health and safety regulations and promotes inclusivity and accessibility and overall wellbeing. Initiatives include:

• **Accessibility improvements**: Upgrading our facilities to include automatic doors, and accessible restrooms, ensuring ease of access for colleagues with mobility challenges.
• **Ergonomic workstations**: Customising workstations to meet the specific needs of colleagues with disabilities, promoting comfort and reducing the risk of injury.
• **Assistive technology**: Investing in technologies, on our external websites to support users with visual impairments.

Monitoring equal pay

Monitoring pay rates among colleagues is an important step to ensure that everyone is fairly rewarded for their work and contribution to our business. We continuously review ways to address any differences in pay and work hard to support career development and progression for all colleagues. Our businesses in the UK and Ireland that are in scope for gender pay reporting under local legislation publish their gender pay reports on their websites. In Spain and Finland to comply with local legislation, we submit equity data and plans. The Group also reports gender diversity data under the FTSE Women Leaders Review and ethnic diversity data under the Parker Review. We were pleased to have improved our ranking amongst the FTSE 250 from 90 in 2024 to 57 in the 2025 FTSE Women Leaders Review.

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Social disclosures – S1 Own workforce continued

Colleague engagement

The success of our business is closely aligned with our corporate culture and the contribution and commitment of each of our colleagues. We recognise the fundamental importance of colleague engagement and talent management to the future growth of the Group. We seek to ensure that all colleagues are fully engaged in their work and with the workplace. We encourage their active participation in decision-making processes.

Workplace forums, such as works councils and colleague committees, serve as platforms for discussing important work-related matters. These forums allow colleagues to present ideas and questions to business leaders who consider their viewpoints and concerns. The forums aim to foster trust and confidence between colleagues and the business and plays a significant role in our engagement strategy and diversity strategies.

Colleague engagement surveys provide us with valuable insights into colleague satisfaction and sentiment. Colleagues across our business can participate in formal engagement surveys at least once every two years. Survey results are shared with management teams and colleagues, and local action plans are developed to improve engagement. The results and action plans are discussed with business unit management, and turnover and retention rates are continuously monitored. The engagement survey results are also shared with the Board. In 2025 we appointed Gallup as our Group-wide engagement survey partner going forward.

Non-Executive Directors attend colleague forum meetings at larger businesses in the UK and Ireland at least once a year, allowing them to gather the views of colleagues and learn about their businesses directly. The Non-Executive Directors then share this information with the Board, providing a colleague perspective to assist in decision-making and considering the views of this important stakeholder group. Where directors cannot attend due to language barriers, a summary of the discussion is provided.

Grievance process

Formal grievance and disciplinary procedures across all our businesses serve to protect colleagues' interests, ensure workplace grievances are addressed objectively, and deliver effective resolution to colleague concerns. Our aim is to handle grievances promptly and fairly to maintain a positive workplace environment and to prevent issues from escalating. Our SpeakUp reporting service, managed by a third party, allows colleagues to report concerns confidentially and anonymously.

Confidential feedback

All our businesses have grievance and whistleblowing processes, including the SpeakUp reporting service, described in further detail on page 68, ensuring that colleagues have a facility for anonymous reporting and protection against retaliation. SpeakUp reports are documented and reviewed, with an annual summary presented to the Audit and Risk Committee.

Social bargaining, collective bargaining and freedom of association

We respect the right to freedom of association and collective bargaining for all our colleagues and maintain a neutral stance regarding their choices to join or not join a trade union. Colleagues are entitled to representation by trade unions or other elected representatives, in line with local regulations.

Talent

Our businesses manage recruitment, development and talent in a way that is suited to their people and market. To support these programmes in 2025 we developed a Group talent management system which will be implemented across the Group beginning in 2026. This provides a simple uniform system for managing performance, developing our people and following best practice in people management for our colleagues around the Group.

Our businesses continued to develop new and existing colleagues through training and development programmes. Across the Group, more than 750 colleagues are engaged in government-funded training schemes.

Total colleagues

	2025	2024
Total headcount at the year end	**10,001**	10,003
Breakdown by region		
Island of Ireland	**3,634**	3,578
Great Britain	**3,504**	3,571
Northern Europe	**2,064**	2,067
Iberia	**799**	787

Colleagues by contract type

	2025	2024**
Permanent	**96%**	95%
Temporary	**4%**	5%
Full-time	**77%**	77%
Part-time	**22%**	23%
Zero hours colleagues*	**1%**	n/a

* Included for the first time in 2025. Zero hour colleagues defined as employees without a guaranteed minimum number of working hours. Work is offered as needed.

Colleagues by gender

	2025	2024**
Male	**72%**	73%
Female	**28%Δ**	27%

Colleagues by age

	2025	2024**
<30	**20%**	20%
30-50	**46%**	49%
>50	**34%**	31%

** Restated to include data for Salvador Escoda which was acquired in Q4 2024.

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Social disclosures – S1 Own workforce continued

Gender distribution in management

	2025		2024	
	Number	**%**	Number	%
Board of Directors				
Female	**3**	**38%**	3	38%
Male	**5**	**62%**	5	62%
Group Management Team				
Female	**2**	**40%**	2	40%
Male	**3**	**60%**	3	60%
Senior Management				
Female	**11**	**38%**	10	32%
Male	**18**	**62%**	21	68%

Accounting principles

The 2024 data, which previously excluded Salvador Escoda, has now been restated to reflect its inclusion following the business joining the Group in the last quarter of 2024.

The data above includes the members of the Board of Directors of Grafton Group plc, the Group Management Team (GMT) and Senior Management as at 31 December 2025 and 31 December 2024.

The membership of the Board and the GMT is set out on pages 72 to 74.

'Senior Management' is the group reported for the purposes of the FTSE Women Leaders Review, which comprises the GMT and their direct reports.

Training and development

We invest in continuous learning and development opportunities for our workforce to enhance skills and career growth and offer equal access to development opportunities, such as apprenticeships, training programmes, mentorship, and career advancement resources. We review our talent and succession plans regularly to address disparities, reinforcing our commitment to ensuring fairness and equality in career progression.

We keep up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for colleagues and their progression.

Reward

We take a comprehensive approach to pay, benefits and reward to ensure that all colleagues feel valued and motivated. We offer a range of rewards and recognition programmes to celebrate colleague achievements and milestones. We continuously assess the evolving needs of our workforce and regularly update our compensation and benefits policies. Our benefits package includes health insurance, retirement plans, and wellness programmes.

Our policy is that all colleagues receive at least 1% above the local national minimum wage. Our businesses operate either in the UK or the EU, and the countries in which we operate either have a statutory national minimum wage or our colleagues are covered by a collective agreement which determines minimum pay levels for the sector. In countries where there is a statutory national minimum wage, we define the wage benchmark for our colleagues to be national minimum wage +1%.

Implementation of the EU Pay Transparency Directive is progressing across the Group. In Ireland, Woodie's and Chadwicks have completed job evaluations, while Finland has finalised job levelling and initial pay analysis in line with compliance requirements. In Spain, the project commenced in January 2026 with leadership engagement underway, and in the Netherlands, implementation is scheduled for January 2027 following a government deferral. Beyond regulatory compliance, these initiatives are modernising reward practices, strengthening transparency, internal equity, and data-driven decision-making across the Group.

CEO total remuneration metrics

The table on page 108 shows the ratio of the CEO's total remuneration to the lower, median and upper quartile full-time equivalent remuneration of the Group's UK colleagues.

Social protection

We are committed to supporting our colleagues through various life events that may impact their income. Our benefits programmes are designed to provide financial security and peace of mind. We provide safeguards against income loss due to major life events including loss of income due to sickness, unemployment, workplace injury and acquired disability, parental leave and retirement.

All our businesses operate within the EU or the UK and all colleagues are covered by at least the statutory minimum payments for sick pay, redundancy pay, parental leave and redundancy payments. Many of our businesses also provide enhancements to these benefits.

Colleague health and safety

We believe nothing we do is so urgent that we cannot do it safely.

We remain committed to doing everything we can to ensure that our colleagues, customers and business partners return home safe and well each day. We continue to embed health and safety into our everyday business practices at all levels of the Group.

Safety, Health, and Environment (SHE) teams in each of our businesses work together with their senior leadership teams and the Group SHE Director to integrate health and safety planning into all aspects of the business operation. Risk assessments are completed locally in each business with the significant findings and safe systems of work designed to eliminate, reduce, isolate and/or control risks whilst reflecting and integrating with the reality of business operations.

Each business is subject to regular health and safety audits, including branch compliance checks by internal teams in the businesses, external enforcement officer inspections, and higher-level reviews by the Group SHE Director and the Internal Audit and Business Risk team. These measures support and drive a continual health, safety, and wellbeing improvement plan in each business.

We encourage all colleagues to actively contribute to our health and safety agenda by raising concerns, making suggestions and providing feedback on risk assessments and safe systems of work. This is facilitated through a combination of day-to-day management, team meetings, focus groups, our 'Notify' safety management system and the Group Risk Committee.

Unsafe event and near-miss reporting across the Group has increased by 30% from 2021 to 2025 as colleagues at all levels have taken positive steps to report unsafe events or near misses, which allows local management to investigate them before someone is injured, helping us to eliminate or reduce the risk of future injuries.

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Social disclosures – S1 Own workforce continued

During 2025 we developed an additional reporting level to encourage all colleagues to tell us about hazards, conditions, concerns or suggestions through the 'Notify' safety management system. Safety Matters will be launched during 2026, with a simple QR code giving all colleagues immediate access to flag a concern or a suggestion and upload a picture. This is intended to further engage and empower all colleagues to own health and safety in their local environment as well as flagging potential issues that may have wider implications across the business or even the Group.

In 2025, ongoing emphasis on the Group's key health and safety priorities contributed to a further reduction in both lost time injury frequency and severity. The individual activities and initiatives in each business are tailored to their individual risks but the key priorities remain focused on the potential for significant injuries:

• Keeping pedestrians safe from moving vehicles and plant;
• The safe handling and storage of products, including safe working at height; and
• Safe customer deliveries.

Ensuring that all colleagues remain actively engaged and involved with key priorities, as well as their respective local initiatives, is essential for supporting our efforts to maintain safety.

Initiatives in 2025 across all businesses included:

• Colleagues in CPI EuroMix and Selco stopped work for a Safety Stand Down and Safety Pause safety discussion with business leaders on various topics including forklift truck operations, storage and handling practices and being a Safety Citizen.
• Chadwicks further developed their 'Yard of the Year' competition to showcase 'what good looks like' and won the Innovation award at the Irish Health & Safety Excellence Awards for their forklift safety observations app. They also successfully completed their second 'Tour de Forks' competition, highlighting forklift operating skills and safe practices in a gamified competitive format.
• Woodie's increased their focus on traffic management plans, fitted Halo perimeter lights

on forklift trucks and replaced all aircraft steps with dedicated electric stock pickers to remove the need for carrying products up and down the steps.
• Several Isero departments achieved level 3 accreditation on the Safety Culture Ladder in 2025 and Isero and Polvo continued to convert training on safe systems of work to e-learning programmes. Many businesses in the Group have started converting safe systems of work and training topics into more interactive short films to simplify the messages for colleagues.

In 2025, the Group lost time injury frequency rate (LTIFR) reduced by 3.7% and the lost time injury severity rate (LTISR) reduced by 6.8%.

During the period 2021 to 2025, the LTIFR and LTISR reduced by 16.3% and 38.6% respectively.

Visible felt leadership of health and safety across all levels of supervisors and managers in our businesses will continue to be a fundamental focus in 2026 to promote our commitment to health and safety and to positively recognise colleagues doing the 'right thing' whilst reinforcing the correct behaviours where necessary.

Colleague wellness

We believe in supporting the physical, social, emotional and financial aspects of our colleagues' wellbeing, which includes mental wellbeing.

We recognise that mental health is just as important as physical health. Our leadership team and Board are fully committed to fostering workplaces where colleagues can speak openly about mental health, seek support without fear of stigma and feel confident that their wellbeing matters. We want all our workplaces to encourage open dialogue about mental health supported by awareness, education and everyday conversations.

Our Wellness at Work Policy outlines our strategy and provides a baseline standard across all our businesses. We provide health benefits and sick pay to ensure our colleagues stay fit and are supported during times of mental or physical ill health.

We also offer assistance to colleagues dealing with personal or work-related problems that might affect their job performance, health and wellbeing. This benefit provides confidential support and counselling services to our colleagues.

We ensure a safe and pleasant work environment, provide mandatory health and safety and job-specific training, and offer work breaks and holidays, along with free hot and cold refreshments. We offer communal spaces, recognise key life events, and support paid volunteer days and locally approved charities.

We encourage all our businesses to view wellness through a diversity, equality and inclusion lens to ensure we are being equitable and fair with support that can affect colleagues' health and financial outcomes.

Our CEO Mental Wellbeing Statement, which is available on our Group website, www.graftonplc.com, sets out our leadership approach to colleague wellbeing which underpins colleague engagement and is to the benefit of our business and all our stakeholders. It is important that we all show care and respect for each other, support work-life balance and that our businesses provide the tools and resources to support our colleagues.

Lost time frequency
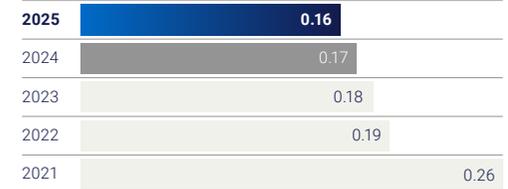Lost time injuries/100,000 hours worked

0.84

Year	Value
2025	0.84
2024	0.87
2023	0.86
2022	0.92
2021	1.00
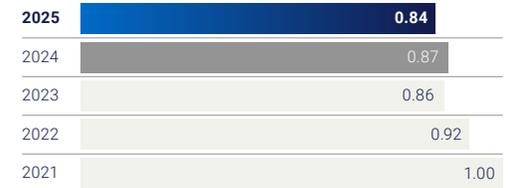
Lost time severity
Working days lost/2,000 hours worked

0.16

Year	Value
2025	0.16
2024	0.17
2023	0.18
2022	0.19
2021	0.26

Accounting principles for health and safety

Health and safety metrics cover all colleagues. Lost time injury frequency rate refers to the number of work-related injuries resulting in lost working days per 100,000 hours worked. Lost time injury severity rate refers to the number of lost working days due to a work-related injury per 2,000 hours worked. Days lost are calculated from the first full day to the last, based on a five-day working week.

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Social disclosures – S2 Workers in the value chain

Business activity	Policy/approach	Metrics/targets
Responsible sourcing in the supply chain	Human Rights Policy Supply Chain Due Diligence Policy Supplier Code of Conduct Deforestation Policy	Proportion of suppliers by spend risk assessed on the EcoVadis IQ+ platform Proportion of higher risk suppliers completed ratings assessment

Supply chain risk management is a top priority for the Group, and we understand the importance of effective management of the environmental and social impacts in our supply chain.

Our businesses source products from a range of suppliers including:

- Branded building materials manufacturers
- Branded raw materials suppliers
- Own brand suppliers
- Distributors and agents
- Suppliers engaged through buying groups

Our due diligence process enables us to assess whether our suppliers have effective processes in place to manage their environmental and social impacts, including ensuring fair working conditions for individuals involved in the manufacture of the products we sell. In 2025, we launched our EcoVadis programme with our commercial teams and suppliers.

Policies
The Grafton Group Code of Business Conduct and Ethics outlines the standards expected of colleagues when interacting with suppliers.

The Grafton Group Supplier Code of Conduct defines our requirements for suppliers regarding legislative compliance, human rights, environmental sustainability and business practice. The Code is available in multiple languages and has been published on business unit websites. It has been approved by the Group CEO and Group Procurement Board.

The Codes are reviewed every two years, or sooner if significant changes occur.

In 2025 we published our Human Rights Policy following the completion of our human rights risk assessment. Workers in the supply chain were one of the key groups of people that formed part of this assessment.

Supply chain due diligence
Our due diligence process is designed to identify and mitigate risks within our supply chain. Each of our business units manages their own sourcing process. Businesses in the Group work with EcoVadis on our due diligence process with the Group Sustainability Team overseeing the process and reporting*.

EcoVadis is a globally recognised sustainability rating agency conducting assessments based on international sustainability standards to assess our supply chain partners.

We carried out 16 training sessions involving 80 commercial colleagues, held monthly drop in clinics for commercial teams and launched a training video for commercial colleagues.

At the end of our launch phase of our programme, over 1,750 suppliers were uploaded and risk assessed on the EcoVadis IQ+ platform accounting for 89.5% of 2025 spend**.

Suppliers accounting for 9.72% of total spend** were deemed higher risk and are being engaged to complete an EcoVadis Ratings Assessment or share alternative third-party assessment.

15.9% of suppliers by spend** have completed an EcoVadis Rating. The Ratings assessments take a few months to complete and be verified and scored so we are aiming to increase this percentage in 2026.

In addition to the EcoVadis process, we have established mechanisms in place to identify supply chain concerns. These include supplementary screening checks and the SpeakUp anonymous reporting service, which allows stakeholders to report any concerns confidentially to an independent party with safeguards in place. We also actively encourage open dialogue between suppliers and our commercial teams.

Colleague training and engagement
In 2025 we launched our new due diligence policy and associated process across the Group. We completed training sessions with commercial teams, held drop-in sessions and developed a training video for new commercial team members. From September 2025 we started internal reporting on EcoVadis performance.

Value chain worker engagement
Engagement of value chain workers is a key element of the EcoVadis rating process that higher risk suppliers are assessed against.

Value chain worker channels
Our SpeakUp service is available for all suppliers to share concerns.

Severe human rights abuses
No instances have been reported or identified through the screening process.

Resources invested
Given the importance of supply chain management and due diligence this is an important area of investment.

We invest resources in our risk management and screening platforms, sustainability, procurement, analyst and audit resource in the Group and businesses.

Accounting principles
Supplier information is extracted from the Group Procurement Dashboard. All suppliers that the Group spent over 25,000 Euro with in 2024 were uploaded onto EcoVadis IQ+. EcoVadis risk assess suppliers. Data points are presented based on spend in 2025 reporting period excluding Salvador Escoda who were completing their sustainability onboarding programme in 2025.

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* Salvador Escoda suppliers will be uploaded in phase 2 of the programme in 2026 as their sustainability onboarding is completed.
** Spend excludes Salvador Escoda.

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Social disclosures – S4 Consumers and end users

Business activity	Policy/approach	Metrics/targets
Product safety and quality	Group Product Safety and Quality Principles	Internal Audit assessment of effective implementation every three years

As a European multinational distributor of construction related products and solutions, ensuring we engage our customers effectively, listen to their ideas and concerns and respond appropriately is critical to our commercial success.

Our customers include:

- SMEs involved in RMI
- Large private sector customers involved in the construction industry
- Public sector organisations
- DIY customers

Our business units engage with customers in a range of different ways such as:

- Customer service teams
- Customer surveys
- Customer insight programmes
- Product return processes
- Face-to-face conversations in branch

These engagements provide valuable insights that inform the development of our customer propositions.

Impact area and disclosure

Product safety and quality

Product safety and quality processes of our manufacturing businesses are incorporated in the resource use and circular economy information on page 57.

In addition, our distribution and retail businesses have approaches tailored to their product and supply mix. These processes include contractual arrangements with suppliers to ensure products meet appropriate standards, product recall processes and procedures should a concern arise, technical manuals covering products specifications, safety and quality standards as well as product testing regimes for certain product categories.

Health and safety of customers in our branches

The Group Health and Safety Policy and approach covers our customers in branch. Further detail on our approach to health and safety is set out on pages 63 and 64.

IT and cyber security, privacy and data security

Our approach to privacy and data security is set out on page 68.

Additional social disclosures

Human Rights

Our human rights framework includes the following elements:

Human Rights Policy

We published a human rights policy in 2025 which covers the Group.

Human Rights Assessment

We conducted a human rights risk assessment in 2025 to evaluate the potential impacts on various stakeholders, including workers in the supply chain, colleagues, customers and communities. The assessment focused on salience by considering the number of people affected, the severity of potential risks, the ability to remediate these risks and the processes in place for managing and monitoring these risks.

Governance

The human rights framework is overseen by the Executive Sustainability Committee who approved the risk assessment and policy.

Management

We have a programme to manage each of our salient issues related to own workforce and suppliers which are covered in other sections of this report.

Tracking progress and communication

Progress against the framework will be assessed annually with details provided in the appropriate sections of our Sustainability Statement and Modern Slavery Statement.

Community

Our businesses operate in a diverse range of communities and many of our colleagues come from these communities. It's incredibly important to act as a good neighbour and use our skills and experience to help those in need.

Colleagues care deeply about supporting community programmes through volunteering, fundraising and donating. As a business we are proud to have contributed over £1.7m to charities and good causes which equates to 0.93% Δ of adjusted operating profit, significantly higher than our target of 0.8%. We also raised over £1.0m through colleague and customer fundraising.

The contribution by the Group to communities is made up of:

- Volunteering time by our colleagues paid for by the business for a host of activities which could include everything from supporting local schools, refurbishing buildings, skills training and fundraising.
- Monetary donations from the business to local community groups, usually voted for by our colleagues. These can take the form of donations and matched funding for colleague fundraising activities.
- In-kind donations which includes materials donated at a local level to support the refurbishment of buildings and services such as marketing, press and print needed to raise awareness of the organisations and issues.

Total donated by Grafton via volunteering, materials, sponsorships and cash donations

❯£1.7m

Total donated by customers and colleagues

❯£1.0m

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Governance disclosures – G1 Business conduct

To deliver our business and sustainability goals we underpin our strategy with robust governance processes, policies and procedures, effective training and awareness, responsible sourcing and responsive management of risks and opportunities.

Governance disclosures	**G1 Business conduct**
Strategy linkage	**Ethics**
UN SDG	5 GENDER EQUALITY · 8 DECENT WORK AND ECONOMIC GROWTH · 10 REDUCED INEQUALITIES · 12 RESPONSIBLE CONSUMPTION AND PRODUCTION · 13 CLIMATE ACTION

Governance impacts, risks and opportunities
The table below summarises Grafton's governance IROs

Key:
— Risk   + Opportunity
↑ Upstream   → Own operations   ↓ Downstream

ESRS topical issue	Sub-topic	Impact	Value chain	Risk/opportunity
Business conduct	**Bribery and corruption**	Zero tolerance of bribery and corruption essential to meet regulations and operate as a responsible business.	↑ → ↓	— Bribery and corruption by colleagues or third parties results in financial loss to the business and reputation damage. Failure to comply with anti-corruption regulation.
	IT & cyber security, privacy & data security	Potential breaches of data can impact all stakeholders of the business.	↑ → ↓	— Risk that external or internal parties will try to gain unauthorised access into Group systems to deliberately disrupt business operations, steal information or commit fraud, resulting in financial loss, impact on the Group's reputation and lead to disruption or breach of privacy for colleagues, customers and suppliers. Failure to comply with data protection regulation.

Governance and business conduct

TCFD

Business activity	Policy/approach	Metrics/targets
Ethical business practices	Bribery and corruption policy	Compliance on ethical business practice training (covers bribery and corruption)

Sustainability governance is integrated into Grafton's overall governance structure as outlined on page 75.

The Board of Directors has ultimate responsibility for sustainability governance. Sustainability was discussed in depth at two Board meetings during the year and an update was shared by the Group CFO at every Board meeting. Topics covered in 2025 included sustainability legislation (in particular deforestation and CBAM), climate change, supply chain due diligence, sustainability legislation, progress, plans and reporting.

The Audit and Risk Committee is responsible for overseeing and monitoring the Group's risk management systems and the steps taken to mitigate key risks, including sustainability and climate change.

The Executive Sustainability Committee (ESC) was established in 2023 to develop and implement the Group's sustainability strategy subject to approval and ultimate oversight by the Board. Its role is to ensure that sustainability considerations are appropriately embedded into the wider business strategy and commercial decision-making process, and that sustainability opportunities and risks have been identified and that measures are scheduled to capitalise on opportunities and mitigate risks.

The ESC comprises the Group CEO, Group CFO and Group Head of Sustainability as well as Group and business leadership. It met three times in 2025.

Sustainability and climate risks and opportunities are assessed and reviewed by the Group Risk Committee (GRC) which is described in further detail on page 31. The GRC evaluates each of the Group's material risks, including health and safety, sustainability and climate change, to confirm that the risk is appropriately described and prioritised, and that the current mitigating controls and actions are sufficient to manage the risk within the Group's appetite.

The Sustainability Working Group is led by the Group's Head of Sustainability and includes functional heads with expertise in property, people, environment and ethics. The Working Group is

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Governance disclosures – G1 Business conduct continued

responsible for facilitating actions to help the Group and individual businesses implement the sustainability strategy, and respond to the identified climate risks and opportunities.

The Group Sustainability Strategy and Climate Programme is being implemented by the individual business units. The CEOs of those businesses are responsible for implementing and managing their own sustainability and climate change programme which is consistent with the Group's overall strategy. Each business has formed its own sustainability committee or working group to monitor and manage its sustainability actions. In 2025 we established a Group Sustainability Forum to share ideas and best practice.

The Group Head of Sustainability had regular meetings during the year to discuss progress and share good practice with the teams in the business units.

Share awards to the Group CEO, Group CFO and senior management made in 2025 under the Group's Long Term Incentive Plan included targets relating to GHG emissions reductions (Scope 1 and 2) and gender diversity in leadership.

Ethical business practices
The Group Code of Business Conduct and Ethics, which is available on www.graftonplc.com, reflects our responsibility to uphold high standards of ethics and integrity, and it sets the standard of behaviour which colleagues, contractors, agents and businesses are expected to follow. The Code and associated policies are the subject of mandatory training courses which are accessed by colleagues through the Group's online learning management systems.

Compliance rates are recorded and reported to the Group Risk Committee and Group Internal Audit who perform testing to confirm compliance with key aspects of the Code and Group policies as part of annual reviews. The mandatory training courses are expected to be completed by colleagues within the first three months of joining the Group, and then retaken on a regular basis (either annually or every two years depending on the course).

Overall compliance rates for the completion of mandatory training courses by colleagues across the Group have improved and are either above or approaching the target level of 95%.

Mandatory training compliance rates

	2025	2024*
Business conduct and ethics	94.74%	92.44%
Information security awareness	94.50%	89.23%
Regulatory compliance	95.70%	91.59%

* Excludes Salvador Escoda as these colleagues were onboarded to the training system after the reporting date.

Accounting principles
Colleague compliance with the requirement to complete three online group mandatory training courses is monitored and reported against. The requirement is for new starters to complete the training within three months of joining and then renew as required by the course in question.

The targeted population is colleagues of all Group businesses and Group Head Office at 31 December for each year.

Data is taken from the learning management system of the individual business units and collated at Group. Compliance is expressed as a percentage of total number of colleagues in scope of the course and classed as compliant divided by total number of colleagues in scope of the course. The target for compliance is 95%.

SpeakUp
The Group SpeakUp Policy is available on www.graftonplc.com. Colleagues are encouraged to report any concerns they have to their line manager including anything of an ethical business nature. In addition, the Group has an established whistleblowing process in each of its territories.

The SpeakUp service allows colleagues to report concerns confidentially to an independent party with safeguards in place to ensure cases are investigated fully and prevent retaliation to reporters. Awareness of the process is raised through colleague training, business communications and posters at each of our locations. A link to the reporting website is also included on the Group and individual business unit websites. We also encourage third parties, including customers and suppliers to report any concerns of wrongdoing by businesses or colleagues through the service.

During 2025 the Group transitioned to a new third-party provider for its SpeakUp service. The change has improved the security over reports and investigations, and enabled better engagement between reporters and investigation teams. In 2025 there was a 7% increase in the number of case reports received through the SpeakUp service compared to 2024. 27% of cases were substantiated following investigation and resulted in remedial action including dismissal, disciplinary, retraining and process improvement. The average time taken to investigate and close cases was 20 days from receipt of the report which was within the Group's target of 30 days.

Privacy, data and cyber security
Grafton has continued to build on the progress of previous years in respect of process improvements and investment in information technology to detect and protect our data and systems. Both data protection and information security are key areas of focus, underpinned by comprehensive policies and ongoing awareness campaigns to ensure that all colleagues play their part in keeping information safe and secure. Each business has a cyber attack incident plan setting out the steps to react to and recover from a cyber incident, and regular assessments are carried out to identify and resolve vulnerabilities. These are rehearsed each year.

Key cyber security controls are subject to regular dashboard reporting at a business level which is monitored by the Group's Information Security Steering Committee. During 2025 the Group's information security controls framework was rolled out to Salvador Escoda.

Anti-bribery and corruption
The Group Anti-Bribery and Corruption Policy sets out the Group's zero tolerance approach to all forms of bribery and corruption, and the standards expected of all colleagues. It includes thresholds and approval requirements for the offering and receiving of gifts and hospitality to and from third parties by colleagues. All colleagues are required to complete an annual declaration of independence to confirm whether they have any known conflicts of interest, as defined in the policy. Any declared interests are reviewed by management and HR, with actions to manage or remove conflicts agreed with the colleague. Colleagues are made aware of the policy requirements through mandatory training and awareness videos. Compliance with the policy and the management of potential conflicts of interest is reviewed and tested by Group Internal Audit through annual compliance audits.

The Group conducts regular assessments of fraud, bribery and corruption risks. The most recent assessment was performed in 2025 as part of activities to comply with the UK Economic Crime and Corporate Transparency Act. Colleagues are required to report potential instances of bribery and corruption to management or through the confidential SpeakUp service. All reported matters are disclosed to the Audit and Risk Committee.

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Independent practitioner's assurance report

Management of Grafton Group plc
Scope
We have been engaged by Grafton Group plc ("Grafton") to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on Grafton's selected performance data and statements (the "Subject Matter") contained in Grafton's (the "Company's") Annual Report for the year ended 31 December 2025 (the "Report").

The Subject Matter includes the following selected performance data, which are also marked with a **Δ** symbol in the Report:

• Greenhouse Gas (GHG) emissions:
– Scope 1 and Scope 2 (location based) absolute tonnes of carbon dioxide equivalent
– Scope 1 and Scope 2 (market based) absolute tonnes of carbon dioxide equivalent

• Diversity:
– % of women in group operations: Total number of female employees in the continuing operations of the Group divided by total number of employees in the continuing operations of the Group expressed as a percentage.

• Contribution to the community:
– Investment and/or sustainability related fundraising (including colleague time for paid volunteering, sponsorship of community groups, gifts in kind and cash donations, excluding colleague and customer fundraising) as a percentage of adjusted operating profit for the Group.

• Waste:
– Total tonnes of waste diverted from landfill, divided by the total tonnes of waste generated in operations.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Criteria applied by Grafton
In preparing the Subject Matter, Grafton applied the accounting requirements of the World Resources Institute Greenhouse Gas Protocol and Grafton's publicly disclosed criteria that is available on the Grafton website (the "Criteria"). Such Criteria were specifically designed by Grafton to guide the measurement and reporting of the Subject Matter. As a result, the subject matter information may not be suitable for another purpose.

Grafton's responsibilities
Grafton's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities
Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the *International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ISAE 3000 (Revised)') and *International Standard for Assurance Engagements on Greenhouse Gas Statements* ('ISAE 3410'), and the terms of reference for this engagement as agreed with Grafton on 6 November 2025 and 2 March 2026. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our independence and quality management
We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements*, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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Independent practitioner's assurance report continued

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

The Green House Gas quantification process is subject to scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs. Additionally, GHG procedures are subject to estimation (or measurement) uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.

Our procedures included:

- Conducted interviews with personnel to understand the business and reporting process, as well as the process for collecting, collating, and reporting the Subject Matter during the reporting period
- Checked that the calculation methodologies have been correctly applied in accordance with the Criteria
- Undertook analytical review procedures to support the reasonableness of the data
- Identified and tested assumptions supporting calculations
- Tested, on a sample basis, underlying source information to check the accuracy of the data

We also performed such other procedures as we considered necessary in the circumstances.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Subject Matter as of 4 March 2026 for the year ended 31 December 2025, in order for it to be in accordance with the Criteria.

Use of our assurance statement

This report is produced in accordance with the terms of our engagement letter dated 6 November 2025 and 2 March 2026, solely for the purpose of reporting to the directors of Grafton in connection with the Subject Matter for the period ended 31 December 2025.

Those terms permit disclosure on Grafton website, solely for the purpose of Grafton showing that it has obtained an independent assurance report in connection with the Subject Matter.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's directors as a body, for our work, for this report, or for the conclusions we have formed.

Ernst & Young
Dublin, Ireland
4 March 2026