



Modern slavery **statement**

Grafton Group plc
Modern Slavery Statement 2025

Grafton Group plc Modern Slavery Statement 2025

Introduction

At Grafton we are committed to respecting and upholding the human rights of the people within our organisation, throughout our supply chain and in the communities we engage with, following the UN Guiding Principles on Business and Human Rights. The Group recognises the risks of modern slavery in complex businesses and supply chains and is committed to taking appropriate steps to address these risks. We believe that every individual has the right to freedom, dignity and security. By putting measures in place to address the risk of modern slavery, we aim to uphold these rights and contribute to the creation of a fair and just society.

This statement is made pursuant to the expectations set out for businesses in the UK Modern Slavery Act 2015* and the Netherlands' Child Duty of Care Act 2019*. However, we are alert to the emerging legislative landscape applicable to our operations in the EU and UK and are preparing for legislation on forced labour, due diligence and associated reporting requirements.

We are committed to acting with integrity across all aspects of our business operations and our commitment to ethical conduct is set out in the Group Code of Business Conduct and Ethics (the "Code") which is available on our website www.graftonplc.com. All colleagues across the Group are required to adhere to the Code, which sets out that we do not tolerate any form of forced, involuntary or child labour.

However, we recognise that no business or supply chain is without risk of modern slavery and are clear that we have a responsibility to understand human rights risks and work in partnership with others, especially suppliers, to identify and mitigate them.

This statement was approved by the Grafton Group plc Board of Directors on 3 March 2026 and is signed by Eric Born, Group CEO, and David Arnold, Group CFO.

The statement addresses the following key areas:

- 1. Organisational structure and supply chains**
- 2. Policies in relation to modern slavery, human trafficking and child labour**
- 3. Due diligence processes, risk assessment and management**
- 4. Training and key performance indicators**

* This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the 'Act') and constitutes the modern slavery and human trafficking statement of Grafton Group plc ('Grafton'; the 'Group') in respect of the financial year ending 31 December 2025. It is also made pursuant to the Netherlands Child Duty of Care Act 2019. The Modern Slavery Act applies to the following subsidiaries of Grafton Group plc during 2025: Selco Trade Centres Limited, CPI Mortars Limited, T.G. Lynes Limited, LSDM Limited, Macnaughton Blair Limited and AVC (Stairbox) Limited. The Netherlands' Child Labour Due Diligence Act applies to the following subsidiaries of Grafton Group plc during 2025: Isero B.V. and Polvo B.V. Grafton has adopted a Group approach to supply chain due diligence and this statement applies to all of Grafton's businesses to the greatest extent practicable.

Business and supply chains

We are a European multinational distributor of construction related products and solutions comprising four geographic segments serving the Island of Ireland, Great Britain, Northern Europe and Iberia. In our home Irish market, we also operate the leading home improvement retailer.

Our distribution colleagues serve our customers through regional or national branch networks of leading local brands. Our B2B offering includes a range of customers from small and medium sized contractors active in the residential repair, maintenance and improvement ('RMI') market to large contractors and corporations involved in new-build programmes.

We operate the largest consumer-focused DIY retailer in Ireland which is complementary to our Irish distribution business. We also produce mortar and timber staircases and windows in Great Britain.

As a Group, we employ approximately 10,000 people in our operations. We also have an extensive supply chain across goods for resale and goods and services not for resale.

We work with many suppliers and manufacturing locations in Ireland, the UK and mainland Europe and we also source from further afield. In 2025 we launched our supply chain due diligence programme with EcoVadis and published our due diligence policy. We also completed a human rights risk assessment and published our human rights policy.

The Grafton Group Supplier Code of Conduct sets out our expectations for suppliers covering legislative compliance, human rights, environmental sustainability and business practice. The Code is published in multiple languages and on business websites.

Policies in relation to modern slavery, human trafficking and child labour

Responsible procurement is a key part of the Grafton sustainability strategy. The Grafton Human Rights Policy outlines our commitment to complying with the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration of Fundamental Principles and Rights to Work and the International Bill of Human Rights and the OECD Guidelines for Multinational Enterprises.

The Grafton Code of Business Conduct and Ethics states that we will not purchase from suppliers that procure products for Grafton from countries subject to trade sanctions, or if the supplier or its sources are listed in connection with a trade sanctions program or other list of proscribed individuals or entities relevant to the countries in which the Group operates. The Group has a colleague training programme on the Code and monitors compliance rates.

The Grafton Group Supplier Code of Conduct sets out our expectations for suppliers covering legislative compliance and human rights. The Code has been published in multiple languages and on all business unit websites.

The Group also has an anti-bribery and corruption policy as well as a SpeakUp policy, described in further detail below, designed to ensure ethical business practices as well as encourage concerns to be raised.

For Grafton colleagues there is a suite of Human Resources policies to ensure the Group protects the rights of all colleagues with dedicated HR personnel at Group level and within each business unit to support management in ensuring that these policies are adhered to.

Due diligence and risk management

In 2023 we carried out extensive stakeholder engagement as part of our double materiality assessment in preparation for the EU Corporate Sustainability Reporting Directive (CSRD). This process of engagement reaffirmed the importance of respecting the human rights of people in the organisation and through the value chain.

In 2025 we launched our new due diligence policy across the Group. We delivered training sessions with commercial teams and developed a training video for new commercial colleagues. From September 2025 we started monthly internal reporting on the EcoVadis programme.

We also work with a third-party to screen chosen suppliers against international sanction lists (including UN, UK and EU). This includes suppliers which are based in countries deemed to be High and Medium risk for sanctions, based on the terms of our Group banking arrangements and legal advice.

At the end of 2025, 89.5% suppliers by spend were uploaded and risk assessed on the EcoVadis IQ+ platform and 9.7% were deemed higher risk. Suppliers covering 15.9% spend were Rated*. The Ratings assessments take a few months to complete and be verified and scored so we are aiming to increase this percentage in 2026. Our teams are engaging with higher risk suppliers to complete the EcoVadis Ratings assessment or share alternative assessments and evidence of their environmental and social risk management processes.

This process has helped us to gain greater visibility of our supply chain and to inform our risk-based approach to supply chain management. The Executive Sustainability Committee oversees the effectiveness of our due diligence policy.

	Island of Ireland	Great Britain	Northern Europe	Iberia
Number of branches and factories	122 2024: 115	122 2024: 122	136 2024: 140	93 2024: 92
Brands	  	     	 	

* Spend excludes Salvador Escoda. They will be included in 2026.

Supply chain due diligence



A number of our business units have extended the risk management programme further and partnered with external supply chain due diligence experts to assess ethical standards in higher risk suppliers and support the implementation of their supplier manual.

For example, Selco started work with Surety for their direct sourcing programme. Surety carry out detailed compliance and sustainability assessments on, and develop improvement programmes with, each factory that they work with covering ethical, environmental, safety and quality issues.

CPI Euromix maintained its Construction Products Certification (CPC) BES 6001 accreditation for product and supply chain sustainability and ethics.

Grafton also completes an EcoVadis Rating each year to assess our own performance and we achieved a silver badge which means we are in the top 15% of responders.

We have other mechanisms in place to identify concerns including the SpeakUp whistleblowing service which allows any stakeholder to report concerns confidentially to an independent party with safeguards in place, as well as open dialogue between suppliers and our commercial teams.

Recruitment and human resources

We are committed to full compliance with all applicable employment laws and regulations in the countries where we operate. Grafton has implemented rigorous HR processes and controls to ensure that every colleague's right to work in the respective jurisdiction is verified. Grafton has established workplace equality processes and ensures that wages, benefits, and working hours adhere to the relevant legislation in each jurisdiction. Our business units conduct regular reviews of HR policies and controls to maintain the highest standards of compliance and fairness. This commitment forms a crucial part of Grafton's efforts to combat modern slavery and uphold human rights within its operations.

Training and key performance indicators

All colleagues are required to complete Ethical Business training within three months of joining the Group and at two yearly intervals thereafter. At the end of 2025 the compliance rate was 94.7 per cent. The completion of this training is a key performance indicator which is overseen by our Group Risk Committee and is part of our sustainability strategy and there is ongoing activity to improve this compliance rate further.

We developed and launched a sustainability training video for all commercial teams and carried out training sessions on EcoVadis throughout the year.

Confidential feedback

An independent third-party reporting service ("SpeakUp") is available to allow colleagues and third parties to raise concerns anonymously and with someone outside the Group should they wish to do so. Colleagues also receive training on the SpeakUp policy. This policy sets out the duty of Group colleagues, external consultants, contractors and agency staff to report any concerns they may have about suspected wrongdoing. The policy sets out how colleagues and third parties can report concerns and how those reports and the individuals making reports will be treated.

In 2025 none of the reports made to SpeakUp related to modern slavery. All colleagues also have a channel available for feedback to senior management while colleagues in the UK and Ireland have the opportunity to feed back to Non Executive Directors who attend Colleague Forums.

We recognise that modern slavery, child labour and wider human rights programmes require continued focus and improvements and are committed to strengthening our risk assessment, training and due diligence programmes in the coming years.

Eric Born

Eric Born
Group CEO

4 March 2026

David Arnold

David Arnold
Group CFO

4 March 2026