

GROUP LIMITED

## **Anti-Bribery and Corruption Statement**

Bathroom Brands Limited (the 'Company') and its subsidiaries (together the 'Group') are committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the Group's behalf is responsible for maintaining the Group's reputation and for conducting business honestly and professionally.

The Group considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting tree markets. The Group benefits from carrying out business in a transparent and ethical way. The Group does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems to prevent and eliminate bribery, in accordance with the Bribery Act 2010.

The Group and its subsidiary companies have issued an anti-bribery and corruption policy outlining the Group's position on preventing and prohibiting bribery and corruption. This policy applies to all employees and they are required to familiarize themselves and comply with it.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or Group (whether directly or indirectly) to induce or influence that individual or Group to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of the Group are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its anti-bribery measures, the Group accepts transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure, whether given or received.

A breach of this policy by any employee will be treated as grounds for disciplinary action. The Group will not/do not conduct business with service providers, agents or representatives that do not support appropriate anti-bribery and corruption objectives. The success of the Group's anti-bribery and corruption measures depends on all employees and those acting for the Group, playing their part in helping to prevent bribery. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected bribery in accordance with the procedures set out in the Policies or in the case of third parties to the Company Secretary. The Group will support any individuals who make such a report in good faith, with training being made available in pursuit of best practice.

Signed:

Jeremy Bird,

Chairman, Bathroom Brands Ltd

Anti-Bribery & Corruption Statement August 2023

Date: 19 SEPT '23



## Review

The Group communicates periodically to employees and associated persons on the matter of anti-competitive practices. The implementation of this policy and related procedures will be reviewed, monitored and reported on a regular basis, at least annually.

Employees and those working for, or on behalf of, the Group are encouraged to provide any suggestions, comments or feedback that they may have on how these procedures may be improved.

The Group reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.

Signed:

Jeremy Bird

Chairman, Bathroom Brands Ltd

Date: 19 SEPT '23



GROUP LIMITED

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Equal opportunities in employment

The Company will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.

Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions.

Your responsibilities

All staff are required to assist the company to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination.

You can be held personally liable as well as, or instead of the Company for any act of unlawful discrimination. Staff who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the Company's disciplinary procedure. Acts of discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

## Grievances

If you consider that you may have been unlawfully discriminated against, you may use the Company's grievance procedure to make a complaint. If your complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity at work policy.

We will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Signed:

Jeremy Bird

Chairman, Bathroom Brands Ltd

Equal Opportunities and Diversity Statement August 2023

Date: 19 SEPT 23



GROUP LIMITED

## Anti-Slavery and Human Trafficking Statement

Bathroom Brands limited (the 'Company') and its subsidiaries (together the 'Group') are committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. The UK subsidiaries covered by the group statement are listed in appendix 1.

We are committed to preventing slavery, human trafficking, forced and child labour in our corporate activities, and to ensuring, as far as we are able, that our supply chains are free from slavery and human trafficking.

We are therefore committed to addressing the requirements of the UK Modern Slavery Act 2015 and ensuring that our supply chain is compliant with the regulations prescribed therein.

We govern all current and future third party relationships with these slavery issues in mind. We do not knowingly support and/or do business with any suppliers who are involved in slavery.

Due diligence procedures are in place to assess the nature and extent of our exposure to the risk of slavery. In order to fulfil our obligations under the Act, the Group continues to:

- request information regarding third party supplier's working practices and require the relevant supplier to confirm that it is aware of, and complies with, its obligations under the Act;
- communicate to potential new suppliers that we have a zero tolerance policy with regards to slavery;
- include reference to, and compliance with, these slavery supply chain issues
  in our supplier engagement process, supplier audit procedures and
  contractual arrangements with third party suppliers.
- identify and assess particular product and/or geographical risks of modern slavery and human trafficking, including through the completion of our 'Supplier Code of Conduct Declaration'.
- Terminating our relationship with suppliers that violate our Supplier Code of Conduct.

We continue to provide training to ensure an understanding of slavery and our obligations under the Act to all key employees, including Board members and Executive officers.

This statement, which will be reviewed annually and updated as required, has been approved by our Board of Directors and is made pursuant to section 54 of the Act and constitutes the Group's modern slavery and human trafficking statement, as required by the Act, for our financial year ending December 2022

Signed:

Jeremy Bird

Chairman, Bathroom Brands Ltd

Date: 19 SEPT '23