

Modern Slavery Act Statement 2017/18

Introduction

This statement is made on behalf of James Halstead plc pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act'). It sets out the steps taken by the James Halstead plc and other relevant group companies (Halstead Group) during the year ending 30 June 2018 to prevent modern slavery and human trafficking in its business and supply chains.

The Halstead Group has a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain. Staff are expected to report concerns, however small, using the appropriate reporting channels, and management are expected to act upon them.

Organisational Structure and Supply Chain

James Halstead plc is a major international group of companies that manufactures and distributes many of the notable brands in commercial, contract and consumer flooring. The group has built a global reputation for the quality of its products, effective service and after sales support.

Our product supply chains are global and includes the sourcing of raw materials for our manufacturing processes as well as key suppliers of finished products and other goods and services required in the operation of our business.

Our Policies on Slavery and Human Trafficking

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

- **Whistleblowing Policy**
We are committed to conducting our business with honesty and integrity and we encourage all staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be investigated as appropriate and that their confidentiality will be respected. This includes any concerns staff may have about modern slavery or human trafficking.
- **Corporate Social Responsibility Policy**
This policy is an expression of fundamental values and represents a framework of our existing operating principles and outlines basic standards of conduct for our employees and suppliers.

Due Diligence

We understand that our biggest risk of exposure to Modern Slavery is in our raw material and product supply chains. Whilst we are committed to obtaining and retaining competitive goods and services we will at the same time seek to ensure they are from sources that have not jeopardized human rights and they adhere to the highest standards of ethics.

To minimise this risk, existing and new suppliers and factories/sites are subject to due diligence checks in the form of audits conducted by or on behalf of the Halstead Group.

As part of our procurement process, we will only engage with suppliers who confirm their compliance with the Act and their adherence to relevant human trafficking and slavery laws in each of the relevant countries in which they operate.

We will continue to keep our staff informed and raise awareness of how to recognise and respond to indicators of human rights abuses.

Our Performance Indicators

We review the effectiveness of our policies and procedures to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by monitoring if any reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

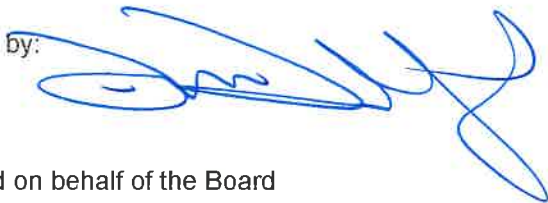
Consequences

The Halstead Group takes any breach of this Policy extremely seriously. Suppliers who are found to have or be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy will be liable to have any supply agreement, arrangement or other contract with terminated immediately, without compensation.

Approval

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Directors who will review and update it annually.

Signed by:

A handwritten signature in blue ink, appearing to be 'M. J. ...', written over a horizontal line.

For and on behalf of the Board

July 2018