

Anti Slavery Statement

This statement has been published in accordance with the UK Modern Slavery Act 2015. It sets out the steps taken by C. Brewer & Sons Limited and its US subsidiary, Wallpaper Direct Inc, (together, the Brewers Group) to combat modern slavery, servitude, forced labour and human trafficking – together, these are known as 'modern slavery' - in its own business and supply chain for the financial year ending 31 December 2023. To a large extent, this has been a period of consolidation of previously stated actions and intentions in relation to ensuring modern slavery is kept out of our supply chains and our business. This statement also includes what action we will take in 2024.

We, C. Brewer & Sons Limited, do not tolerate any form of modern slavery. We are committed to ensuring that there are no acts of modern slavery or human trafficking within the Brewers Group businesses or our supply chain, or from our sub-contractors or partners. This commitment is at the heart of our Modern Slavery and [Human Trafficking Policy](#), which we review on an ongoing basis and which was updated in November 2022.

Who we are

We are a provider of decorating products and services, as well as interior home furnishings through our 'Brewers Home' brand. Our principal activity, and that of the Brewers Group, continues to be the business of wholesale and retail decorators and builders merchants.

C. Brewer & Sons Limited has its head office in Eastbourne, England and has over 1,500 employees across more than 190 stores in the UK. Wallpaper Direct Inc is an e-commerce business based in Tennessee, USA. It has three employees. C. Brewer & Sons Limited sources the products and materials it offers for sale and we fulfil orders on its behalf.

The Paint Shed Limited, which became a subsidiary of C. Brewer & Sons Limited in May 2023, is the largest independent decorators merchant in Scotland. It has more than 100 employees across 19 stores in Scotland and the north of England. Its annual turnover is not such as to require it to publish its own anti-slavery statement, but we aim to include it in our anti-slavery measures over the course of the next two years. For the purposes of this statement however, it is not included in the Brewers Group.

The Brewers Group also includes a number of dormant subsidiary companies.

Transparency

We upload our anti-slavery statements to the UK Government's modern slavery statement register as part of our commitment to transparency and the drive against modern day slavery. Prior to the establishment of the Government's register in 2021 we uploaded our anti-slavery statements to the register operated by [tiscreport.org](https://www.transparency.org).

Our supply chains

We work with a large network of suppliers. As mentioned in our previous anti-slavery statements, we have identified that less than seven per cent of the products we source are from countries outside of the UK or European Economic Area (EEA). We will continue to monitor any change in that figure on an ongoing basis. We consider that it is those suppliers outside the UK and EEA which are potentially more at risk of being

affected by modern slavery and human trafficking, but we acknowledge that modern slavery and human trafficking may also occur within the UK and/or EEA and throughout our supply chains. We are focussed on improving our monitoring of all of our suppliers (both new and existing), starting first with those based outside the UK and EEA. Our objective remains to complete the implementation of due diligence questionnaires and ensure that all of our suppliers are asked to complete them to confirm their adherence to our own policy on modern slavery and human trafficking. We will not knowingly support or deal with any business, organisation or individual involved in modern slavery or human trafficking, irrespective of where they are located.

Our policies on slavery and human trafficking

We remain committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and [Human Trafficking Policy](#) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or our supply chains.

We regularly review, and update as appropriate, the Brewers Group's Colleague Handbook which sets out the Code of Conduct and embodies the Brewers Group's culture, purpose and values (including in relation to slavery and human trafficking). The Colleague Handbook provides guidance to the Brewers Group's employees and contractors on the high standards of professional and ethical conduct expected of them and aims to preserve the Brewers Group's reputation for high standards of conduct. We also comply with right to work checks for all new employees and remain mindful that illegal working can be linked to modern slavery.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers and ensure that colleagues will never be reluctant to raise concerns, including in relation to modern slavery and human trafficking.

Through our due diligence processes, we aim to identify which suppliers should be prioritised for an external ethical audit. We will also consider internal ethical audits where appropriate to ensure that the policies and procedures we put in place are effective and resilient. We will appoint competent third parties to carry out such ethical audits where we consider it necessary or beneficial.

Supplier adherence to our values

We recognise the most significant modern slavery risks to our business are in our supply chain – primarily with those suppliers based outside the UK and EEA, although we remain vigilant in relation to the possibility of risks existing in any part of our supply chain. We will continue to undertake due diligence in relation to our suppliers and prospective suppliers (including by asking them to complete questionnaires of the kind mentioned above), and seek their agreement to adhere to our values, including those set out in our Modern Slavery & Human Trafficking Policy.

To further adherence to our values, we continue to develop and improve our Supply Chain Compliance Programme. A number of departments within the business (including those with responsibility for legal and compliance, human resources, procurement and sales) continue to contribute to the development of the programme, which will remain a key focus in 2023 and on an ongoing basis.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff and have ensured our directors and senior management are responsible for providing adequate resources and sufficient training and investment to ensure that slavery and human trafficking does not take place within our organisation or our supply chains.

We will continue to improve our colleague training in relation to modern slavery and human trafficking at all levels of the business where these issues could be encountered, but particularly amongst directors, senior management and those involved directly in the procurement of goods and services. Those individuals received specialist training in detecting and avoiding modern slavery from a third party training provider during 2023. The knowledge gained by them will be disseminated to other staff and we will seek to introduce regular training sessions to build awareness of modern slavery and ethical sourcing risks among key employees, including those responsible for overseeing our Supply Chain Compliance Programme and buyers of products, with the aim that these key employees are better placed to identify good and poor or inappropriate practices in our supply chain. It remains a key aim to ensure all relevant staff have an awareness of modern slavery and human trafficking, and its relevance to our business.

Future Plans - 2024

Following a review of the effectiveness of the steps we have taken in 2023 to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking in 2024:

- Our Directors and senior management will continue to be responsible for implementing this statement.
- We will monitor our progress against this (and last year's) statement and take further steps to reduce the possibility of modern slavery in our supply chain.
- We will ensure that new staff in relevant senior roles complete training similar to that provided to existing key individuals in 2023.
- We will allocate adequate resources to continue training all relevant staff – see 'Training' above.
- We will write to those suppliers we have identified to be more at risk to understand what controls and measures they actively have in place to combat modern slavery; and we will ask them to confirm their adherence to our own policies.
- We will continue the development of our Supply Chain Compliance Programme and aim to produce and implement a comprehensive questionnaire to be completed by all suppliers we have identified as being at higher risk.

Statement approval

This statement was approved on 3 May 2024 by the Board of Directors of C. Brewer & Sons Limited. It is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Brewers Group's slavery and human trafficking statement for the financial year ending 31 December 2023.

Entities covered by this statement

This statement covers C. Brewer & Sons Limited and its US subsidiary, Wallpaperdirect Inc.



Mark Brewer

Director and Chairman

For and on behalf of C. Brewer & Sons Limited

Date: 3 May 2024