



Topps Tiles Plc

Modern Slavery Act 2015 – Section 54

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery Transparency Statement for Topps Tiles Plc (“Topps Group” or the “Company”) which includes its relevant wholly owned subsidiaries for the financial year ending 30 September 2025.

Introduction

The Topps Group is committed to ensuring that modern slavery and human trafficking does not take place in our business or our supply chain. Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero-tolerance approach to modern slavery and human trafficking, and our focus is to ensure that we are operating ethically and responsibly. We manage this by ensuring that we have robust policies and procedures in place across all operations and supply chains.

We acknowledge our responsibility under the Modern Slavery Act 2015 and will ensure transparency within our business and in our dealings with suppliers.

Our Business

The Topps Group is the UK’s leading tile specialist, delivering a multi-brand, multichannel offer that serves every customer segment in the tile market. The Group has developed and diversified and now includes three sales channels, offering tiles and associated products to a wide range of customers and clients across all sectors in the UK. Throughout our specialist, multi-channel business model, we offer differentiated physical, digital and direct selling propositions, creating a compelling tile offer for every customer segment.

Topps Tiles is an omnichannel market leading business serving trade professionals and homeowners through approximately 300 stores across the UK and online.

CTD Tiles serves trade and housebuilder customers with a network of 22 stores, and our commercial business, Parkside, serves the specifications and architectural market within the UK. Its focus is on providing expertise and service to these sectors from across our product range.

Our online pure play business consists of Pro Tiler Tools and Tile Warehouse. Pro Tiler Tools offers a market leading range of professional tiling consumables and accessories to a trade-orientated customer base. Tile Warehouse is focused on providing high quality tiles at very competitive prices and is targeted at value-conscious homeowners. Tile Warehouse operates online only with all sales delivered directly to the customer.

Along with our national store network, we operate from the following locations –

- Our central office and distribution centre in Leicester
- Protiler Tools office and distribution centre in Northampton

The business is supported by 1,800 colleagues



Our Product Supply Chain

We aim to mitigate the risk of modern slavery in our supply chain through transparency and a strong working relationship with our suppliers.

We source products directly from manufacturers on a global basis to bring the latest styles, designs, and innovative products to the market. We focus on building long-term strategic relationships with our suppliers, thus enabling us to better understand their business and working practices. Our product supply chains are extensive, with circa 160 Tier 1 suppliers spread across 25 countries.

As a trusted retailer and supplier to commercial projects, our customers expect our products to be ethically sourced. Working with a global supply base, we appreciate the present risk of modern slavery and human trafficking occurring and are committed to ensuring all our suppliers adhere to the highest ethical standards, demonstrate safe working conditions and are treating workers with dignity and respect. In support of this, our technical team, and buyers:

- Ensure that all supply contracts require adherence to our Responsible Sourcing Code.
- Conduct regular due diligence and audits to assess compliance.

Our suppliers are required to be transparent with the factories they use for production, and each factory is registered by us and is required to adhere to our Responsible Sourcing Code.

Our Responsible Sourcing Code

Our Responsible Sourcing Code* sets out the minimum standards that we require of our suppliers and others within our supply chain concerning labour standards, factory conditions and human rights. We are committed to the highest standards and will not support or deal with any supplier we know or suspect to be knowingly involved in slavery or human trafficking.

The Code is based on the principles of the Ethical Trading Initiative based code (ETI).

[*Responsible Sourcing Code](#)

Due diligence (supply chain) & Risks Management

We closely monitor the factories producing our products for compliance to our Responsible Sourcing Code.

During this year we have updated our Standard Operating Procedure where we have reviewed our existing countries of supply, sought risk scores, and gathered further advice from external parties including Verisio, who are a UK-based company specialising in supply chain transparency, ESG (Environmental, Social, and Governance) risk management, and social compliance auditing. The associated supply chain risks consider country, sector, and product type. By having this data, we have been able to determine the countries that we will not source from as a business and establish risk levels for others.

We consider the following areas to be classed as high risk in relation to modern slavery:

- Geographical related risk – specific country risks where modern slavery is known to be more prevalent.



- Product related risks - for example Natural Stone products where raw materials are quarried.
- Labour related risks - labour providers, agency workers and sub-contractors

Whilst these areas are classified as high risk, some of the risks are mitigated by our long-term supplier relationships where we have a better understanding of their operations. This year we have further aligned business units within the group and within these risk areas we have added eight new facilities to our supply base in the last 12 months.

Audit (supply chain)

There are 46 suppliers that have been identified as being a potential risk and these are subject to annual audits which are being carried out by Verisio and other third parties.

Where geographical risks have been identified, factory approval and monitoring takes place in partnership with Verisio where we have access to the Optimus platform, a cloud-based supply chain risk management system designed to help manage and monitor our supply chain data more effectively and transparently.

To reduce audit fatigue, we accept all types of third-party audits from factories such as SMETA reports (SEDEX Members Ethical Trade Audits) and BSCI Audits providing that the audits have been carried out by an APCER certified auditor.

Where suppliers have repeated high risk facility scores, then the frequency of auditing will be increased with the audit being semi-announced.

These Ethical Audits demonstrate compliance in the following areas:

Labour: including child labour, forced labour, discrimination, discipline, harassment, abuse, freedom of association, employment contracts and employment contracts

Wages and Hours: including wages, hours of work and benefits.

Health & Safety: including work facilities, emergency preparedness, occupational injury, machine safety, hazardous materials, chemicals, dormitories, and canteen.

Environment: including systems, procedures, and certification

We are working closely with suppliers to ensure that all non-compliances are being addressed within the agreed timescales that are set by the auditor in the Corrective Action Plan. Our fundamental aim is to work with our suppliers on any issues using a continuous improvement model and we will not work with suppliers that fail to engage with us in this process. This process allows us to work with suppliers to eradicate any non-compliance, and this engagement brings about positive change to the facility and its workforce.

Our partnership with Verisio has enabled us to improve standards across our supply chain and to manage individual supplier risk gradings in line with our responsible sourcing code. Verisio manage the closing down of non-compliances once evidence has been uploaded on to their platform. Facilities are classified as one of five risk levels. Supplier performance is an important tool in making our commercial decisions and the interactive “live” scoring of suppliers supports this.

During the year, surveillance visits have taken place at some of our high-risk suppliers by our Sustainability Manager to monitor factory performance, give support and guidance, and to progress the sign off any outstanding non-compliances. These visits are in addition to the audits that are carried out by third party providers.



Where no geographical risks have been identified suppliers must complete the Topps Tiles Self-Assessment Questionnaire which is graded by our Sustainability Team.

Topps Group continue to comply with the 2015 Modern-Day Slavery Act and are committed to ensuring that no forms of Modern Slavery enter the Groups business and its supply chains.

Collaboration

We have a confidential hotline “Speak Up” and website to allow colleagues to report any concerns and breaches of our code of conduct, company regulations and to report any concerns around Modern Slavery or Human Trafficking and have implemented a protocol for handling information of this nature. During the past 12 months there have been no reports in relation to modern slavery reported through the “Speak up” hotline

Training and awareness

We continue to work with our suppliers to share best practice and support them in the audit process to ensure that any areas identified for improvement are addressed promptly.

Summary progress

Progress 2025

- In year, we have continued our partnership with Verisio and have seen notable improvements in supplier gradings with a 50% increase in the number of suppliers being graded as medium or low risk
- Carried out 46 Ethical Audits across 8 countries.
- Inclusion of Pro Tiler Tools high risk suppliers as part of our audit program
- Updated our Standard Operating Procedures to give better clarity of supply chain risks
- Identified specific training opportunities for colleagues by becoming a member of the Supply Chain Sustainability School with tailored training of Modern Slavery in the Construction Sector.

Focus FY26

- Support suppliers in high-risk geographical areas to ensure that a programme of continual improvement takes place over the next 12 months. This will incorporate an increased level of supplier visits, face-to-face presentations and further training options through Intertek.
- Carry out further due diligence risk assessments of our labour and service providers including suppliers of GNFR to reduce the risk of modern slavery.
- We will continue to review our current policies, controls, and training requirements to ensure that they appropriately ingrained within the business.
- Roll out specific training on Modern Slavery in the Construction Sector by colleagues becoming a member of the Supply Chain Sustainability School.
- Following the governments new statutory guidance issued in 2025, for producing Slavery Statements, we will carry out a full review and implement necessary changes

In Our Business

All employees receive at least the National Minimum or Living Wage, depending on their age, with additional variable pay where applicable. While our total pay offering may exceed statutory minimums, we remain fully compliant with all government-mandated wage changes and review our pay structures annually to ensure ongoing alignment. Employment contracts provide colleagues with the freedom to terminate their employment at any time, under the relevant notice provisions. Where a



role is eligible for overtime, overtime working is voluntary.

Recruitment is handled in line with our internal recruitment guidance to ensure that we attract a broad range of candidates and hire on merit. In line with legal requirements, we ensure all new hires demonstrate their eligibility to work in the UK.

We promote a culture of integrity, competence, fairness, and responsibility. As well as our internal policies covering the prohibition of harassment, intimidation and threats, our whistleblowing procedure encourages colleagues to raise any concerns about malpractice or unlawful conduct which they suspect may be taking place at work; this could include concerns about workplace conditions and about modern slavery or human trafficking (no such matters raised during the period covered by this statement).

In addition, our colleague engagement survey, 'Your Voice', allows colleagues to feedback on their experience of working for us and raise any general concerns.

Non-Executive Director Kari Daniels holds the position of Engagement Director and attends meetings of our colleague engagement forum, 'TeamTalk', to provide a voice for colleagues at Board level to ensure that colleagues' concerns are addressed.

All colleagues have access to our independent Employee Assistance Program managed by our partnership with Health Assured. This provides a confidential way for colleagues to seek advice about a range of issues personally affecting them or their families.

Governance

The directors take responsibility for implementing this policy statement and its objectives and aim to ensure that policies are further developed and implemented to ensure that slavery and human trafficking is not taking place within the Company or supply chain.

A full copy of this statement and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically.

Alex Jensen, Chief Executive

15/12/2025