LORDS
GROUP TRADING

MODERN SLAVERY STATEMENT
— 2025 —

MODERN SLAVERY STATEMENT

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Lords Group Trading Plc (“LGT”) takes a zero-tolerance approach to modern slavery and human trafficking in all its forms. Modern slavery is an umbrella term used to describe slavery, servitude, forced or compulsory labour and human trafficking, all of which are fundamentally incompatible with our values and our commitment to responsible business.

As a specialist UK distributor of building materials, plumbing, heating and DIY products operating from 52 sites, we recognise that the greatest risk of modern slavery lies within complex global supply chains, particularly in the sourcing of raw materials and manufactured goods.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and describes the steps taken during the financial year ended 31st December 2025 to prevent modern slavery and human trafficking in our business and supply chains. This statement covers Lords Group Trading Plc and all of its subsidiaries and supply chains.

Modern slavery prevention forms an integral part of our ESG strategy, and oversight is embedded within our formal governance and ESG structure, with ultimate accountability resting with the Board.

Our Business

Established 40 years ago as a family business, LGT is a specialist UK distributor of building, plumbing, heating and DIY goods operating from 52 UK sites. LGT sells to local tradespeople, plumbing and heating merchants, small to medium sized construction companies and directly to the general public through three divisions: Merchanting, Plumbing and Heating, and Digital. LGT was listed on the AIM market of the London Stock Exchange in 2021 and this Statement covers all of the Group's subsidiaries.

The Group's brands within the Merchanting Division are:

Lords Builders Merchants, Hevey Building Supplies, George Lines Civils and Landscape Merchants, Weldit, Condell Building Supplies, MAP Building and Civils Supplies, Advance Roofing Supplies, and A.W. Lumb, Brick Superstore and Roofing Superstore.

The Group's brands within the Plumbing and Heating Division are: APP Wholesale Ltd, Mr Central Heating, Column Rads, HRP Trade, Ultimate Renewables Supplies and Direct Heating.

The Group's brands within the Digital division are:

Building Superstore, Clickbasin (Bathroom Superstore), Door Superstore, Drainage Superstore, Insulation Superstore, Landscaping Superstore, Plumbing Superstore.

In 2022, a materiality assessment identified supply chain, including modern slavery, as one of the key material topics for the Group and its stakeholders.

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Our Supply Chains

LGT's suppliers source materials and products from a variety of countries, including the UK, Republic of Ireland, EU, USA, Canada, Brazil, Turkey, Egypt, Mexico, India, China, Vietnam, South Korea, Taiwan, Singapore, Hong Kong, South Africa and Australia.

Our Supplier Code of Conduct ("the Code") applies to all suppliers of goods and services and their employees, including subcontractors, service providers, consultants and agents, engaged through contractual agreement with LGT. Suppliers are expected to advocate the principles of the Code throughout their own supply chains so that products and services supplied to LGT are producedand delivered in a manner compatible with our standards and reputation.

Due to the nature of the risk, the Group has an assessment process for suppliers. Multiple factors influence the level of modern slavery risk, including geographic location, material type, labour profiles and supply chain tier. Where risks are identified, we work with suppliers to understand and mitigate them in line with the Code.

Merchanting

LORDS BUILDERS MERCHANTS
GEORGE LINES CIVILS & LANDSCAPE MERCHANTS
CONDELL BUILDING SUPPLIES
A.W. Lumb Your Trusted Builders Merchant
ADVANCE ROOFING SUPPLIES
weldit
HEVEY BUILDING SUPPLIES

Plumbing & Heating

HRP Trade Your independent spares specialists
Direct Heating
Mr Central Heating
APP PLUMBING & HEATING
Column Rads™
Ultimate Renewables Supplies Supplying your renewable future

Digital

BRICK SUPERSTORE®
BUILDING SUPERSTORE®
clickbasin from BATHROOM SUPERSTORE
CMO SUPERSTORES
DOOR SUPERSTORE®
DRAINAGE SUPERSTORE®
INSULATION SUPERSTORE®
LANDSCAPING SUPERSTORE®
PLUMBING SUPERSTORE®
ROOFING SUPERSTORE®

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Governance

The Board holds overall responsibility for the Group's ESG strategy, including oversight of modern slavery and human trafficking risks. It approves ESG policies, reviews performance and monitors progress annually.

The ESG Committee supports the Board by tracking delivery of the ESG strategy, setting priorities and reporting on progress. The Executive Board ensures division level compliance and escalates issues to the ESG Committee.

The Group ESG Manager coordinates ESG activities across the business, leading the Supply Chain Due Diligence programme in partnership with the Procurement team, CEO and other senior leaders to strengthen supplier due diligence and ethical sourcing.

The CEO and HR Director jointly oversee the Group's whistleblowing programme, ensuring colleagues can raise concerns confidentially

LGT's key stakeholders include 1042 employees, approximately 109,000 customers and 1,900 suppliers. LGT is in a position to work with and support its suppliers, customers, and employees to tackle modern slavery.

LGT continues to collaborate with industry bodies, including the Builders Merchants Federation (BMF), to share best practice, strengthen collective expectations of suppliers and promote alignment on modern slavery due diligence across the sector. Through these platforms, we participate in joint initiatives and engagement with common suppliers to improve standards and enhance transparency

Governance Structure

The Board	• Ultimately responsible for the Group's ESG strategy and reviewing its effectiveness. • Establishing and communicating ESG policy. • Setting the "tone" and culture for ESG. • Review overall Group progress against the ESG strategy.
The ESG Committee	• Report to Board on status of progress against the ESG strategy. • ESG objectives and performance management through a short, medium and long-term lens. • Highlight where minimum standards are not complied with. • Devolution of ESG targets to Divisions • Annual horizon scanning for changes in the ESG landscape.
Executive Board	• Responsibility for ESG prioritisation at Divisional/Functional level ensuring that minimum requirements are met. • Review of ESG progress at divisional level and escalating compliance issues to the ESG Committee when necessary.
Group Head of Sustainability	• Keep abreast ESG developments that may affect the Group. • Coordinate ESG management activities – develop, improve and maintain the necessary infrastructure for delivery of the ESG strategy. • Support ESG Divisional/Business and Materiality Owners to embed the strategy. • Provide a consolidated ESG report to the ESG Committee/Board
ESG Divisional/ Business Owners Manager	• Drive and coordinate local ESG reporting process at divisional level. • Facilitate Divisional/Functional ESG discussions (as part of existing Management meetings or separate ESG meeting). • Actively share knowledge and best practice through the Group ESG Manager.
ESG Materiality Owners	• Take responsibility for the materiality issue within the division/business, its evaluation, monitoring and reporting its status. • Coordinate and contribute to the development and maintenance of an appropriate control environment and reporting the ongoing effectiveness of controls. • In combination with the ESG Divisional/Business Owners, update ESG reporting on a regular basis.

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Policies in relation to modern slavery and human trafficking

Responsibility for compliance sits with all colleagues, supported through regular training. We maintain a Modern Slavery and Human Trafficking Policy that sets out our zero tolerance approach to forced labour, human trafficking, child labour and all forms of slavery or servitude within our operations and supply chains.

Our approach is underpinned by key Group policies, including our Whistleblowing Policy, Employee Code of Conduct (Colleague Guide) and Supplier Code of Conduct. These set clear expectations for ethical behaviour, fair treatment, and transparency, and require compliance with all applicable laws and regulations.

Supplier Code of Conduct

The Supplier Code of Conduct is founded on international standards, including the International Labour Organization (ILO) Core Conventions and the ILO Declaration on Fundamental Principles and Rights at Work. It requires suppliers to:

- Prohibit all forms of forced or involuntary labour, including bonded, indentured, slave or human trafficked labour, and ensure all work is voluntary.
- Prohibit child labour, as defined by applicable law and ILO standards, and ensure young workers are protected from hazardous work.
- Uphold fair working conditions, including lawful working hours, wages and benefits, respect for freedom of association and collective bargaining, and humane disciplinary practices.
- Prohibit discrimination, harassment and abuse, and treat all workers with dignity and respect.
- Provide a safe and healthy working environment, with appropriate health and safety training, equipment and facilities.

LGT is also committed to the UN Guiding Principles on Business and Human Rights and supports the UN Sustainable Development Goals, in particular those relating to decent work, reduced inequalities and responsible consumption and production. These frameworks guide our approach to preventing modern slavery and promoting respect for human rights throughout our operations and supply chains.

Where the Code and local legislation differ, suppliers are expected to apply whichever standard affords the greatest protection to people and the environment, provided this does not conflict with local law.

Risk Assessment

LGT continues to strengthen its approach to identifying, assessing and managing modern slavery risks in our operations and supply chains.

In 2023, we conducted a high level assessment of our top 40 suppliers by spend, reviewing their compliance with the UK Modern Slavery Act 2015 using company websites, Companies House data and the UK Government's Modern Slavery Statement Registry. Of those suppliers, 31 were obliged to publish a statement; 30 were compliant and one became compliant following engagement with LGT.

In partnership with h&b Buying Group LLP, we continued our risk-based assessment in 2024, issuing ethical supplier questionnaires across common suppliers. Further analysis identified potential vulnerabilities in raw material extraction and manufacturing in higher risk regions such as Africa and Asia, particularly in sectors such as timber, copper, stone, brick and glass.

We use external indices, such as the Global Slavery Index, to categorise suppliers by risk level through a traffic light system, prioritising high risk suppliers for detailed review at least every two years. Our Supplier Code of Conduct requires suppliers to maintain their own risk assessments and controls to ensure they are not directly or indirectly involved in any form of involuntary or forced labour.

To enhance consistency and visibility, LGT is implementing a new technology enabled risk mapping system to centralise supplier data, track risk indicators in real time, enabling a more proactive management of emerging issues.

Due Diligence of our supply chain

LGT applies structured due diligence before and throughout supplier relationships.

All new suppliers are required to review and sign our Supplier Code of Conduct as part of onboarding, confirming that they comply with applicable laws and the standards set out in the Code, including those relating to forced labour, child labour, fair working conditions and non-discrimination. We are progressively incorporating these requirements into standard contracts and tender documentation, making adherence to the Code a condition of doing business with LGT.

Suppliers must also ensure that any subcontractors, labour providers and other third parties they engage comply with the human and labour rights and ethical business practices set out in the Code. This includes ensuring that:

- All workers have the legal right to work and, where relevant, valid work permits.
- No recruitment fees or related costs are charged to workers and any such fees are borne by the employer.
- Workers are not required to lodge deposits or identity documents and are free to leave employment upon giving reasonable notice.

In 2023–2024, we engaged Mazars to independently review our modern slavery risk management approach and strengthen governance systems. Recommendations from that review led to updates in the Supplier Code of Conduct and the appointment of a dedicated ESG Manager to oversee implementation across all divisions.

During FY25, in partnership with h&b, our most material suppliers completed an online assessment covering environmental, labour, compliance and governance topics. Approximately one-third of assessed suppliers now meet or exceed minimum client requirements, with 64% of suppliers classified as critical risk transitioning into lower risk categories.

LGT continues to work collaboratively with suppliers to improve standards and reserves the right to delay onboarding, suspend or terminate contracts in cases of serious or persistent non-compliance with the Code.

Auditing and continuous improvement

In line with our Supplier Code of Conduct, LGT reserves the right to monitor and audit suppliers' compliance with the Code and applicable law. Suppliers are expected to cooperate by providing relevant information on request and, where appropriate, to undergo audits or site visits.

Suppliers are also required to monitor their own supply chains, conduct audits where necessary, and effectively remedy any noncompliance in a timely manner, at no additional cost to LGT or our customers. Breaches of the Code may adversely affect a supplier's relationship with LGT and may lead to corrective actions, heightened monitoring or, ultimately, contract termination.

We encourage suppliers to share actions taken to improve their business practices and welcome suggestions on how LGT can further support implementation of the Code's principles across the supply chain.

Due diligence within our own business

LGT applies the same diligence to its internal operations. We comply with all employment, labour and Right to Work laws across the UK and Ireland, and uphold high employment standards and we assess modern slavery risks within our own operations, including the use of temporary and agency labour, logistics and facilities based roles, which have been identified as higher risk labour profiles across the UK retail and distribution sector

Agency contracts are being updated to include provisions on modern slavery and fair working practices so that agency workers receive the same protections as directly employed staff.

The LGT Employee Code of Conduct (Colleague Guide) defines behavioural standards, antislavery expectations and compliance with ethical business practices. Any allegations of misconduct or breaches are addressed under formal internal procedures.

Training and awareness

Training and awareness remain fundamental to enabling colleagues to recognise, prevent, and appropriately respond to modern slavery and human trafficking risks.

The Lords Group Modern Slavery Training programme, available via the Group's e learning platform, has been mandatory for all colleagues since early 2025. Supplementary educational materials are made available through the internal communications platform, and awareness posters have been distributed across all business sites.

The training is designed to ensure that colleagues are aware of high risk areas and materials, can identify potential instances of modern slavery within the Group's operations or supply chain, and understand the established procedure for reporting any concerns.

Members of the Procurement team in addition to the mandatory training, are required to review and acknowledge the Supplier Code of Conduct, and undertake additional instruction on identifying modern slavery risks within both the business and the wider supply chain.

This supports the consistent application of due diligence measures and escalation processes when engaging with suppliers and contractors.

The Group remains committed to promoting awareness and education across all stakeholder groups regarding the prevention and eradication of modern slavery and human trafficking. The Supplier Code of Conduct sets out the Group's expectations of suppliers and establishes a framework for collaborative partnership in addressing these issues. Suppliers are required to confirm whether they maintain and implement relevant policies and training relating to environmental risk management, health and safety, the prevention of forced or child labour, and anti discrimination, as well as compliance with all applicable labour and human rights legislation.

Any actual or suspected instance of modern slavery or human trafficking, whether occurring in the United Kingdom or overseas, must be reported to the Group Chief Executive Officer or the Group Human Resources Director. These colleagues are responsible for ensuring that any reported matter is escalated to the Board for review and appropriate action.

In addition, the Group introduced mandatory Whistleblowing training and awareness campaign in 2025 to reinforce colleagues' confidence in raising concerns through secure and confidential channels.

As of December 2025,68% of colleagues have completed the Modern Slavery Training and 55% have completed the Whistleblowing Training, the completion rates reflect the timing of rollout during FY25 and workforce turnover. Completion is now mandated as part of induction and we expect completion rates to exceed 95% during 2026 The Human Resources team continues to monitor completion rates actively, ensuring that these training modules form an integral part of the induction process and that managers follow up to ensure ongoing compliance.

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Whistleblowing, grievance & remediation

Our Whistleblowing Policy and Supplier Code of Conduct provide confidential channels for employees, suppliers and workers in our supply chain to raise concerns, including any suspected instance of modern slavery or human trafficking. Concerns can be reported directly to the Group Chief Executive Officer or Group HR Director and will be investigated promptly, discreetly and on a need to know basis.

LGT does not tolerate retaliation against anyone who raises a concern in good faith or participates in an investigation, and any employee engaging in retaliation may face disciplinary action up to and including dismissal. Suppliers are required to ensure that their own disciplinary, grievance and whistleblowing procedures are clearly communicated to all employees and allow concerns to be raised without fear of victimisation.

If we identify or reasonably suspect that modern slavery is occurring within our operations or supply chains, we will take immediate steps to safeguard affected individuals and work with the relevant supplier and, where appropriate, external experts and authorities to investigate and address the issue. Our response may include agreeing corrective action plans, providing guidance to improve practices, suspending activity or, in cases of serious or persistent noncompliance, terminating the business relationship.

Supply chain management & responsible sourcing

During FY25, we enhanced the transparency, resilience and sustainability of our supply chain. Working with h&b Buying Group LLP, we mapped 59% of our most material suppliers, giving greater visibility of sourcing geographies and risk exposure; all mapped suppliers were located in the UK and Ireland.

Suppliers completed a comprehensive ESG questionnaire covering environmental management, legal and regulatory compliance (including antibribery, competition compliance and data protection), product sourcing and responsible raw material extraction, quality control, and people related policies such as health and safety, working conditions and antislavery measures.

Responsible sourcing is embedded in our procurement approach. All timber products are certified under FSC or PEFC standards, supporting responsible forest management and robust environmental and labour protections.

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Our response may include agreeing corrective action plans, providing guidance to improve practices, suspending activity or, in cases of serious or persistent noncompliance, terminating the business relationship.

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Measuring effectiveness

Progress is measured using a set of Key Performance Indicators (KPIs), including:

- Percentage of suppliers that have signed the Supplier Code of Conduct. 52%
- Completion rate of supplier due diligence questionnaires and risk assessments, programme being implemented in 2026.
- Number and proportion of suppliers subject to enhanced due diligence (e.g. audits, document reviews or investigations) following identified risks, to be fully implemented by the end of 2026.
- Employee training completion rates for mandatory modern slavery and whistleblowing modules. (68% Modern Slavery, 55% whistleblowing).
- Number and outcome of whistleblowing cases and concerns investigated relating to modern slavery and broader ethical issues. In the reporting period, zero concerns were raised.

Looking ahead

In 2026, following our exit from the h&b Buying Group, we will establish an independently managed supplier risk management programme across all divisions. This programme will be underpinned by digital technology to facilitate real-time data visualisation, consistent risk monitoring, enhanced supplier reporting, and greater transparency throughout our supply chain.

We will continue to refine our escalation and remediation processes, strengthen supplier engagement, and promote continuous improvement in line with the principles set out in our Supplier Code of Conduct.

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Statement of commitment

This statement, and the actions described herein, has been approved by the Board of Directors for the financial period 1 January to 31 December 2025 on 23rd of June 2026 and is signed by a Director on behalf of the Board.

- It will be reviewed and updated annually and is published on the Group's website and the UK Government's Modern Slavery Statement Registry.

Shanker Patel – Chief Executive Officer
Lords Group Trading Plc

23.06.2026

Lords Group Trading

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