Modern Slavery and Human Trafficking Statement 2025

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Huws Gray has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing appropriate and effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

The Modern Slavery Act 2015 (the "**Act**") introduced changes in UK law focused on increasing transparency in supply chains. Specifically, large businesses are required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery.

This statement relates to the financial year ending 31 December 2025 and sets out the steps we have and are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or businesses and is made pursuant to section 54(1) of the Act.

Group Structure

Huws Gray Limited is the principal trading company of a group of companies (the "**Group**") of which Patagonia Holdco 3 Limited is the ultimate UK parent Company. The Group's ultimate controlling party is Blackstone Group Inc.

The Group's principal activities are the distribution of building products and materials and associated services in the UK.

Through the Huws Gray brand, the Group operates over 250 builders' merchants throughout the UK. In addition, the Group operates a number of associated businesses including **Smiths Britten** and **Frontline Bathrooms** (national bathroom distributors), **C&L** (a specialist civils and lintels distributor), **Hirebase** (a plant and tool hire business), **PDM** (a building products merchant and distributor based in Scotland), **The Timber Group** (a specialist timber importer and merchant), **NDI** (a dry lining, drywall and ceiling materials specialist) and **Huws Gray Partnership Solutions** (providing repair and maintenance services for public sector housing clients).

All of the Group's operations are based in the United Kingdom and the Group employs c5,000 colleagues across its businesses.

Our Supply Chains

The Group's principal suppliers are manufacturers, distributors and importers of building materials, timber and construction products which supply the Group with building materials and products for onward sale to the Group's customers. The Group's businesses can have complex supply chains. We source products predominantly in the UK but, given the nature and range of products we distribute, our products and the raw materials that go into their manufacture can have extended global supply chains.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have adopted an Anti-slavery Policy which forms part of our Company handbook. This 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 supply chains.

Due Diligence Processes for Slavery and Human Trafficking

As stated above, the majority of the products we purchase are from suppliers which manufacture and source materials in the UK or Europe. For products manufactured or sourced outside of the UK or Europe, we source through established and respected UK based suppliers.

In relation to the supply of timber products, we comply with the UK Timber Regulations and undertake due diligence on our timber suppliers to ensure that all products supplied to the Group meet the requirements of the UK Timber Regulations. In addition, the Group holds FSC and PEFC certification ensuring that we are sourcing legal and sustainable timber products. In addition, we are annually audited by the Soil Association to ensure we maintain the required working practices, recording procedures and requirements of FSC and PEFC in relation to our timber and sheet material products.

As part of our ongoing initiatives to identify and mitigate risk, we review our current systems and processes 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.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking.

We review our supply chain management process to ensure all those in our supply chain and contractors comply with our values and their legal obligations. This includes seeking confirmation from key suppliers of the Group that they have implemented contractual arrangements which prohibit modern slavery and trafficking and seeking confirmation that they have adopted their own anti-slavery and human trafficking policies.

Our standard terms and conditions of trading and our Supplier Code of Conduct also require suppliers to comply with all applicable anti-slavery and human trafficking laws and many of our key commercial supply arrangements already contain specific provisions regarding slavery and human trafficking and contractual arrangements will be updated, where necessary, upon renewal.

Recruitment

The recruitment process operated by Huws Gray for the appointment of new employees is designed to operate in a legal and ethical manner and includes:

- validating that the individual has the legal right to work in the country;
- collating suitable references; and
- requesting and reviewing identification documentation.

Huws Gray does not employ any children who are under the legal minimum working age. All apprenticeship roles are offered, and fulfilled, in compliance with applicable law in this subject matter.

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 appropriate training to our staff to raise awareness and highlight any areas of concern they may have.

Effectiveness in Combating Slavery and Human Trafficking

We have not identified any instances or indications that either slavery or human trafficking occurs in our supply chain. As such, we have not considered it necessary to adopt any formal performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. We keep this under review.

Further Steps

As set out in above, the Group is in the process of taking a variety of further steps to ensure that neither slavery nor human trafficking occurs either in our business or in our supply chain.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2025.

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Daksh Gupta
Group Chief Executive Officer
For and on behalf of Patagonia Holdco 3 Limited and its subsidiary companies, including Huws Gray Limited, Bathroom Distribution Group UK Limited and Frontline Bathrooms Limited

16 June 2026