



Human Rights Policy

Headlam creates great places for our communities to live, work and play by providing world class flooring solutions, delivered sustainably. We recognise that it is our responsibility to operate with respect to human rights. Everybody deserves to be treated equally, and with respect and dignity.

This policy applies to all Headlam colleagues and suppliers.

Headlam is committed to respecting all internationally recognised human rights in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our Human Rights policy is informed by the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.

This requires us to act with the utmost due diligence to ensure we do not infringe on the rights of others and address any adverse effects that impact our business, supply chain or communities in which we operate.

Headlam has a [Modern Slavery statement](#) in place which outlines our commitment to trading ethically, with zero tolerance for Modern Slavery (including human rights violations, child and forced labour or human trafficking in any form) in both its operations and supply chain.

Governance

The Board of Headlam has oversight of the ESG plan which includes our commitment to upholding and respecting everyone's Human Rights. The Board is accountable for this policy, and responsibilities are determined throughout the business to deliver against our commitments.

Policy Management

This policy is subject to annual review and approval by the Directors of Headlam, is supported by our annual disclosures, and was last approved on 30 August 2024

Chris Payne
CEO
30 August 2024

Our key commitments

Ethical Code of Conduct

All suppliers to Headlam businesses must agree to uphold the Groups' Ethical code of conduct in line with the Ethical Trading Initiative (ETI) base code and sets out our expectations of suppliers to ensure they have suitable practices within their business and supply chain to recognize and respect human rights.

Supplier Partnership Sustainability Charter

All suppliers are required to sign the supplier sustainability charter which forms part of our ESG strategy and requires all suppliers to promote them within their own business and work collaboratively with Headlam to achieve the goals set out within the charter, which includes mandatory standards they must meet in regard to the safety and wellbeing of employees and their working conditions.

Supplier Due Diligence Assessment

All suppliers must undertake a periodic due diligence assessment to demonstrate that they have suitable practices, policies, and procedures in place to support the commitments signed up to in both the Code of Conduct and Sustainability Charter

Manufacturer Ethical Audits

Where a supplier is manufacturing on behalf of a Headlam brand, a full ethical audit must be undertaken by an independent audit body, to a recognized internal standard, Headlam prefers SEDEX 4 pillar SMETA format.

Modern Slavery Audits

Suppliers located in areas of high risk or where an ethical audit identifies any risk that may violate employee's human rights will be subject to a targeted audit by an independent specialist body

Any supplier in breach against this policy or any of our commitments, that are not appropriately resolved, will result in trading to cease