

HunterDouglas 

**MODERN SLAVERY STATEMENT
FY 2023**



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1 INTRODUCTION

Hunter Douglas Group Limited and its subsidiaries (collectively, “we,” “Hunter Douglas,” or the “Company”) are opposed to slavery in all its forms, including slavery, servitude, forced and compulsory labour, human trafficking, deceptive recruiting for labour or services, debt bondage, forced marriage, and child labour (collectively, forms of “modern slavery”). Hunter Douglas recognises that modern slavery presents serious human rights issues, and we are committed to operating in a responsible and ethical manner around the world.

This Modern Slavery Statement (the “Statement”) is made pursuant to Section 54 of the United Kingdom’s Modern Slavery Act 2015 (“UK MSA”) and Section 14 of the Australian Modern Slavery Act 2018 (“Australian MSA”). It describes the steps taken by Hunter Douglas during the financial year ending 31 December 2023 to assess and address the risk of modern slavery occurring in our operations and supply chains.



2 OUR STRUCTURE, OPERATIONS & SUPPLY CHAINS

Hunter Douglas is a world market leader in window coverings and a major manufacturer of architectural products. The Company was established in 1919 in Germany by Henry Sonnenberg. On 30 December, 2021, Hunter Douglas and 3G Capital, a global investment firm and private partnership, announced that Ralph Sonnenberg, the controlling shareholder of Hunter Douglas, had entered into a definitive agreement to transfer a controlling interest in the Company to 3G Capital. On 25 February 2022, 3G Capital Group acquired a 75% holding in Hunter Douglas, with the Sonnenberg Family retaining a 25% holding.

Hunter Douglas is comprised of approximately 150 subsidiary companies with manufacturing and assembly operations in more than 50 countries. Hunter Douglas employs more than 22,000 people worldwide.

We aspire to help people live beautifully in a connected, energy-efficient space; our dream is to be the fastest growing, most loved, and most efficient window coverings company in the world. The Hunter Douglas culture is one of the key drivers of our strategy to achieve these goals, and it encompasses our core values of transparency, entrepreneurship, accountability, and meritocracy. Communicated consistently throughout the Company, these values call for the highest ethical standards in all interactions with all stakeholders and partners. For more information about Hunter Douglas, please visit our corporate website at <https://www.hunterdouglasgroup.com/>.

Hunter Douglas (UK) Limited is a United Kingdom incorporated wholly owned subsidiary of Hunter Douglas Group Limited, and its subsidiary companies include: Hunter Douglas UK Retail Ltd. (which covers the trading brands Hillarys Blinds Limited and Thomas Sanderson Ltd.), Blinds 2Go Ltd., and Arena Blinds Ltd. The Company's operations across the United Kingdom employ more than 2,000 team members. Our window covering products are manufactured in fully owned U.K.-based facilities or sourced from approved global suppliers.

In addition, in FY2023 Australian-based Blindsonline.com.au Pty. Ltd. was a subsidiary of Hunter Douglas (UK) Limited. With regard to this Australian subsidiary, we sourced product from Australian and overseas suppliers, which produce product in their own factories, or through third-party suppliers, located in Australia and overseas.

3 MODERN SLAVERY RISK

As noted, modern slavery is an umbrella term that covers various forms of illegal exploitation of people for commercial or personal gain. Hunter Douglas is committed to identifying and addressing the risk of modern slavery occurring in our operations and supply chains.

We assess modern slavery risks with reference to a number of modern slavery risk indices, including the Walk Free Foundation Global Slavery Index¹, and information supplied to us through our extensive stakeholder networks (e.g., customers, suppliers, licensors, industry associations, and governments). Hunter Douglas is continually looking to find new means of identifying and mitigating these risks.

A. Operations

In FY 2023, Hunter Douglas assessed the risk of modern slavery in our direct business operations to be low. Hunter Douglas has a robust system of HR policies and procedures that ensure compliance with legally mandated employment entitlements and awards across our workforce. The policies apply to all Hunter Douglas offices and facilities in the United Kingdom and Australia.

¹Walk Free, The Global Slavery Index 2023, Minderoo Foundation, available at: <https://walkfree.org/global-slavery-index/>.

B. Supply Chains

Hunter Douglas recognises that through the window furnishing products sourced from third-party supplier factories and local suppliers, we can be exposed to the risk of modern slavery in the manufacturing process both in the United Kingdom and overseas. We also recognize that modern slavery risks are more likely to exist where human rights principles are not respected.

The Global Slavery Index has identified a shortlist list of 15 imported products common in G20 countries, such as the United Kingdom and Australia, that present a heightened risk of forced labour. While Hunter Douglas's primary product (i.e., window furnishings) does not appear on the list, certain raw materials and components used in window furnishings are included on the short list as set out in the table below.

Global Slavery Index: Importing Products at Risk of Forced Labour	Potential Exposure to Hunter Douglas Supply Chains
Electronics	Electronic components are used in motorized window furnishings
Textiles	Fabrics are used in manufacturing window furnishings (e.g., curtains)
Timber	Timber is used in manufacturing window furnishings



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RISK MITIGATION ACTIONS

Hunter Douglas seeks to work alongside its employees and third-party business partners, including suppliers, to ensure it identifies and addresses modern slavery risks in its operations and supply chains. The need to manage such risks is a key consideration behind the following actions we took during this reporting period:

Policies

Hunter Douglas has various policies and processes that constitute the foundation of our approach to ethics, human rights, and modern slavery. In 2023, we rolled out an updated, comprehensive Code of Business Conduct to serve as a practical guide to living our core values—i.e., transparency, entrepreneurship, accountability, and meritocracy—that will ensure the safety of our people, the sustainability of our products, and the highest level of confidence and respect from our stakeholders. The Code of Business Conduct is applicable to both employees and third-party business partners, and it makes clear that the Company is “committed to business practices that respect human rights in every jurisdiction in which we operate and throughout our global operations and supplier networks.”

Staff Training

We required employees to complete a training session on the Code of Business Conduct. The training included a module on human rights, reminding employees to “take efforts to ensure that all of our operations and processes (including, but not limited to, procurement, manufacturing, fabrication, logistics, etc.) remain in compliance with human rights regulations across the globe.”

Whistleblower Helpline

While the Code of Business Conduct serves as a practical guide to ethical decision-making, Hunter Douglas makes available to all employees (and third-party partners) an Ethics Helpline that enables individuals to raise any questions or concerns about legal or ethical obligations. The Ethics Helpline is a confidential and secure means of reporting in local language that is managed by an independent organization and available anywhere in the world, 24/7. Where local laws permit, individuals can file and follow up on reports anonymously.

Supplier Engagement

In addition to our Code of Business Conduct, many Hunter Douglas subsidiaries require that our suppliers agree to execute and comply with a Supplier Code of Conduct, which includes the minimum sourcing standards that suppliers must meet as a condition of doing business with Hunter Douglas. The Supplier Code of Conduct contains specific provisions addressing modern slavery: “The supplier does not use forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor. The supplier is responsible for employment eligibility fees of foreign workers, including recruitment fees.” In addition, the Supplier Code of Conduct includes specific wording prohibiting conduct associated with child labor, human trafficking, non-compliance with local wage laws, and unauthorised subcontracting.

Third-Party Due Diligence

The Hunter Douglas Global Compliance Team and Procurement function have collaborated to evaluate and onboard third-party risk management tools to improve supplier due diligence and risk assessments. We have begun reviewing our third-party diligence and risk management program to assess whether and where there is a need for improved monitoring of modern slavery and other human rights issues.

5 ASSESSING EFFECTIVENESS

We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chains will be an ongoing and evolving process, and we are committed to building upon the efforts taken to date. At this stage, we are not able to adequately evaluate the effectiveness of measures we have undertaken to identify and address modern slavery risks. However, we will continue to work on developing frameworks, processes, and goals that will enable us to measure the effectiveness of the actions we are taking to identify and address modern slavery risks in our operations and supply chains.

6 CONSULTATION ACROSS HUNTER DOUGLAS GROUP COMPANIES

As set out above, this Statement has been prepared on behalf of Hunter Douglas Group Limited and its subsidiary and affiliated companies, with specific input gathered from the relevant reporting entities.

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FUTURE ACTIONS TO ADDRESS MODERN SLAVERY RISKS

In the next reporting period, Hunter Douglas is committed to further improving our practices and processes to combat modern slavery. This entails better monitoring of and engagement with our supply chains.

This Statement was approved by the directors of Hunter Douglas (UK) Limited, who will review and update it annually.



Andy Thomas
Director

11th March 2024

Date