# Modern Slavery Statement

**Financial Year 01st May 2025- 30 April 2026**

This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes Tower Supplies' Modern Slavery and Human Trafficking Statement for the financial year ending 30th April 2026.

It sets out the steps taken by Tower Supplies to prevent modern slavery and human trafficking taking place in our business operations and supply chains and outlines our planned actions for the next financial year.

## Our Commitment

Tower Supplies is committed to preventing modern slavery and human trafficking in all its forms. We recognise our responsibility to act ethically and transparently and to respect and protect human rights throughout our operations and supply chain.

We commit to the following principles:

- A zero-tolerance approach to modern slavery and human trafficking.
- Acting ethically and with integrity in all business relationships.
- Working with external organisations, including the Slave--Free Alliance, to strengthen our approach to preventing modern slavery.
- Actively identifying, assessing, and addressing risks of modern slavery and human trafficking within our business and supply chains.
- Educating, training, and supporting our employees to understand what modern slavery is, how it may present, and how to raise concerns if it is suspected or identified within our operations or supply chain.

## Our Business and Structure

Tower Supplies was established in 1983 as a UK partnership. In 2025, the business restructured its operating model into two distinct business units to better reflect differing customer bases and routes to market.


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These businesses now operate as:

- Tower Cruise: providing specialist products and services to a global cruise sector customer base, with international distribution.
- Tower Original: supplying health, safety, and hygiene product ranges to a predominantly UK customer base across Power, Utilities, Facilities Management, and Marine industries.

Tower Supplies operates from three sites in Dorset, England:

- One shared Head Office.
- Two distribution centres, one supporting Tower Cruise and one supporting Tower Original.
- We also operate in-house badging and product customisation.

While our customer segments differ, group-wide policies, procedures, and governance arrangements apply consistently across both businesses.

**Our Supply Chain**

Tower Supplies does not undertake direct manufacturing. However, we operate an own-label product range, working in partnership with approved manufacturing sites in the UK and internationally to produce in-house designed products under our own brand.

**Key supply chain principles include:**

- Close strategic relationships with approved manufacturers.
- Regular review of volumes, forecasts, pricing, and compliance.
- No tolerance of subcontracting outside approved manufacturing sites.
- Use of a supplier management system to track certifications, policy renewals, and audit status, with oversight by the Procurement Team.

For third-party branded products, we maintain a global supplier network developed through long-standing partnership relationships. We are committed to ensuring that everyone who works for and with Tower Supplies:

- Is treated fairly.
- Works in safe conditions.
- Has their human rights respected and protected.

We currently have 75 strategic and preferred suppliers, including manufacturers, brand partners, and wholesale partners, who are monitored closely through our supplier management system.


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**Supplier Due Diligence and Risk Management**

Tower Supplies requires all suppliers and business partners to align with our core values and ethical standards, which are formalised in our Supplier Code of Conduct. While adherence to the Code is not a mandatory requirement for all suppliers, we strongly encourage commitment to its principles as a condition of establishing and maintaining a business relationship with us.

As part of our supplier onboarding process, suppliers are required to complete a comprehensive due diligence assessment via our supply chain management system, ARCUS. This assessment covers 14 sections, including but not limited to:

- Financial stability.
- Ethical standards and business integrity.
- Operational capacity and capability.
- Health, safety and insurance arrangements.

In addition, suppliers are requested to become members of Sedex and to link their account to Tower Supplies, enabling us to review relevant Self-Assessment Questionnaire (SAQ) information.

While not mandatory, our strategic and preferred suppliers are expected to hold certification to ISO 9001 (Quality Management) and ISO 14001 (Environmental Management) standards, where applicable.

All supplier due diligence data is collated internally and reviewed as part of a supplier risk heat map, which is used to identify areas of actual or potential risk. Where risks are identified, we work collaboratively with suppliers and relevant internal teams to mitigate and, where possible, eradicate those risks.

Where Tower Supplies operates as a distribution partner, including within extended supply chains or through spot-buy arrangements, we apply a risk-based and proportionate approach to supplier oversight and monitoring.

In addition, suppliers are required to provide evidence of recognised third-party social audits, such as BSCI or SMETA, covering the following areas:

- Forced, bonded or involuntary labour.
- Child labour.
- Freedom of association and collective bargaining.
- Working hours and wages.
- Health and safety conditions.
- Discrimination, harassment and disciplinary practices.


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## Key Actions and Improvements

During this financial year, we have made significant improvements across our business processes, including how we engage with suppliers, customers and utilise third-party organisations such as the Slave-Free Alliance to help strengthen our policies and procedures. These improvements reflect our continued commitment to strengthening our approach to identifying and managing modern slavery risks within our supply chain.

While we have not identified any instances of modern slavery within our supply chain, we recognise that addressing modern slavery is an ongoing journey. We are committed to continuously reducing the risk of modern slavery and to strengthening our understanding of how to respond should any instances be identified. Through continued engagement, learning, and collaboration with our suppliers and partners, we remain focused on enhancing our controls and further mitigating risks across our supply chain.

The section below highlights the key actions and improvements made during the past year and sets out our priorities, targets and areas of focus for the new financial year ahead.

### Speaking Up and Ethical Governance

- Launched a “Speak Out” framework, supported by a refreshed Business Ethics Policy and Modern Slavery Policy.
- Established a confidential reporting process accessible to all employees, enabling concerns to be raised safely and anonymously.
- Introduced QR code access points to improve usability, particularly for warehouse-based colleagues who have limited access to computers during the working day.

### Supply Chain Transparency and Due Diligence

- Fully mapped our Tier 1 strategic and preferred suppliers, forming the foundation of our ongoing supply chain transparency programme.
- Worked closely with suppliers to ensure all documentation, data and disclosures are current and accurately recorded within our internal supply chain management system.
- This includes verification of Sedex membership (or equivalent platforms), and the collection of third-party social and ethical audits conducted within the past 12 months.
- Partially mapped our Tier 2 supply chain, with further mapping and engagement planned as part of our continuous improvement approach.


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## Sedex Engagement and Capability Building

- Enhanced our Sedex engagement, having been a Sedex member since 2020.
- Over the past year, we have worked in closer collaboration with the Sedex team to upskill internal stakeholders, enabling more effective and informed use of the platform.
- With Sedex support, we have also strengthened supplier engagement, encouraging increased Sedex membership and improvements in the completeness and accuracy of Self-Assessment Questionnaire (SAQ) data.

## Customer Collaboration

We were invited by one of our key customers to participate in a pilot in-depth supplier assessment delivered through the Slave-Free Alliance, focused on gaining deeper insight into potential modern slavery risks within high-risk areas of our supply chain.

The assessment is designed to be collaborative, supporting both buyer and supplier to identify potential risks and opportunities for improvement. Its purpose is not only to highlight areas of concern, but also to enable suppliers to take informed, practical steps to mitigate risks and strengthen controls as part of a continuous improvement journey.

The assessment took place in December, hosted at our customer's London office. Representatives from Tower met directly with the Slave-Free Alliance to discuss our modern slavery policies, procedures, governance, and internal knowledge, without the customer present. Following the session, the Slave-Free Alliance produced a risk-rated assessment report, which was shared with the customer and subsequently with us.

We welcomed the opportunity to participate in this pilot and to engage openly in such a constructive and transparent process. This collaborative approach demonstrates how businesses can work together to better identify and manage supply chain risks, while strengthening shared expectations through best practice, learning, and continuous improvement

## Training and employee awareness

- We rolled out modern slavery training to all office-based employees, piloting an online training platform to manage and track completion. Initial completion reached 34%, which we identified as below the standard required.
- Following review, we determined that the platform was not aligned with our business objectives or user needs. The decision was made to include online training as part of our transition to a new HR system. This rollout will establish mandatory annual modern slavery training for all employees and embed the training into induction processes for both permanent and temporary workers.


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**Ongoing Improvement and FY2026 Priorities**

As we enter our new financial year, our focus is on strengthening our processes and working more closely with our supply chain to drive best practice. Partnering with the Slave-Free Alliance is a key component of this approach, supporting the delivery of targeted improvements, the embedding of recognised best practice, and our ambition to be a leader in this area.

We will continue to develop our modern slavery training programme beyond awareness-raising, with a focus on building capability across the business. This includes introducing more role-specific, in-depth training for key positions where risk awareness, decision-making and supplier engagement are critical.

We will also continue to collaborate with our customers where appropriate, recognising that transparency and partnership are essential in addressing complex human rights risks and that shared learning can deliver better outcomes for all parties involved.

This work forms part of our wider ESG strategy, underpinned by our core values of trust and integrity. We recognise that modern slavery is a global and evolving challenge, and while there is always more to do, we remain fully committed to playing our part in its eradication through continuous improvement, accountability and collaboration.

20/06/2026

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Charles Aris
Chief Executive Officer

Date


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