

Modern Slavery – Tower Financial Year 2024/2025

This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 and constitutes Tower Supplies Modern Slavery Statement for our financial year ending 30th April 2025. This sets out the steps Tower Supplies have taken to ensure that slavery and human trafficking is not taking place in any aspects of our business operations and supply chains.

Our Commitment:

- We have a zero-tolerance policy towards modern slavery and human trafficking.
- We are committed to acting ethically and with integrity in all our business relationships.
- We are taking steps to ensure that our business and supply chains are free from modern slavery and human trafficking.
- We are committed to identifying and addressing any risks of modern slavery and human trafficking in our business and supply chains.

Our Business and Structure

Tower Supplies is a UK partnership company, established in 1983, supplying customers with health, safety and hygiene related product ranges across 3 sites based in the UK. We have 2 distribution centres, including our own in-house badging and head office.

We supply our customers with expert advice and market leading products across multiple product categories, serving a range of business sectors with a particular focus on Cruise, Power, Utilities, Facilities Management and Marine including several large UK National Accounts customers.

Our Supply Chain

Tower Supplies do not manufacture; however, we do have our own product label where we partner with manufacturing sites in the UK and numerous other countries who produce our in-house designed product in our own label. We have close relationships with these suppliers and will regularly review business levels, forecast and pricing. We also have approved manufacturing sites for all suppliers that produce own brand product, and we do not tolerate any sub-contracting outside of approved sites. We have a supplier management system to track policy renewal dates and audits that is monitored and updated by the purchasing team.

For all other 3rd party products, we have established a supplier global network over many years through partnership relationships. Tower Supplies are committed to working to ensure everyone who works for and with us is treated fairly, can work safely and has their human rights protected and respected. We have a responsibility to work to ensure modern slavery is not present in any form across our business and within our supply chains and we are committed to ensuring our practices support this.

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We have 75 strategic and preferred suppliers that we consider to be either manufacturers, brand partners or wholesale partners who we monitor closely through our supplier management system.

Policies and Procedures:

Tower requires its business partners and suppliers to share the same core values and business practices, outlined in our supplier code of conduct. All suppliers must sign up to our code of conduct to work with us. When considering a new strategic partnership with a supplier we also have an onboarding process in which we check their financial, ethical and capacity credentials to make sure we are aligned. We do however operate as a distribution partner for our customers and will therefore have an extended supply chain that requires less management, and we will likely spot buy from.

Our strategic and preferred suppliers are expected to have relevant third-party accreditations ISO 9001 and ISO 14001, as well as SEDEX membership. In addition to this, our suppliers need to provide evidence of regular recognised third-party audits, such as BSCI or SMETA that cover labour standards, health and safety, ethics and environmental management.

Due Diligence

In our financial year 2024/25, the following are steps have been taken to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain.

- **Supplier risk review:** We have reviewed all suppliers, their location in terms of modern slavery and child labour heat maps, documentation, SEDEX membership and audit details.
- **Regular cadence of our supplier risk assessment:** A monthly review between ESG & Procurement teams, with an annual review with our C-Suite.
- **Audits:** As a member of Sedex, we use the Sedex Members Ethical Trade Audit (SMETA) for our third-party independent audits of our supply chain. We have set an audit schedule for our next financial year 2025/26 to complete 3rd party 4 pillar audits of our top spend suppliers.
- **Updated supplier code of conduct:** We are finalising and will be launching an updated code of conduct which will be issued to all our suppliers to sign up to.
- **Training and Awareness:** Our Procurement Team have completed Introduction to Modern Slavery Training (Feb 25). All employees have attended our modern slavery overview and policy update (May 25). We are members of the Sustainability Supply Chain School and use their training portal to provide training to our employees.
- **Whistleblowing Procedures:** We have a whistleblowing policy in place All our employees are provided details of our policy and Modern Slavery Helpline.

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- **Accreditations:** We completed our first EcoVadis assessment and achieved a commitment badge. In 2025/2026 we are completing our second assessment, where we are aiming for bronze certification.

Monitoring and Measuring

We monitor our supplier's modern slavery policies through our supplier management system Arcus, and we review them annually through our supplier Quarterly Business Reviews.

We actively monitor and measure our suppliers through KPIs and audits (internal and external). We have regular internal reviews set-up, along with supplier reviews and process to manage underperforming suppliers.

Continuous Improvement

As a company we believe in continuous improvements in all aspects of our business. We understand that as we collect and analyse our data, there will be improvement areas identified, in both our own policies and that of our supply chain. We have scheduled regular cadence reviews internally and with our supply chain, with the purpose of identifying, assessing and mitigating risks and strengthening that of our supply chain.



15.05.25

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Charles Aris
Chief Executive Officer

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Date

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