

Geberit UK Modern Slavery Statement

Introduction

This statement sets out actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The Geberit Group is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chains. We recognise the responsibility that we have to tackle this issue proactively and to take a robust approach through our internal policies and supply chain due diligence.

Organisational Structure

Geberit Sales Ltd (company number 6142557) operates as a supplier of sanitary and drainage systems for commercial and domestic applications. Geberit Service (company number 00546129) operates as a distribution and logistics business.

Geberit Sales Ltd is based in Warwick, England and Geberit Service is based in Alsager, England with both companies being trading divisions and subsidiaries of the Geberit Group, a multinational group which specialises in the manufacture and supply of sanitary parts and related systems.

The Geberit Group acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and in its supply chains.

In 2022, there were no additional risks identified in relation to Modern Slavery.

Supply Chain Due Diligence

We do not believe that any of our activities within the UK are considered to be a high risk for Modern Slavery or human trafficking, however we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or anywhere in our business. Our products are supplied by the Geberit Group from their European manufacturing facilities and are accordingly low risk in relation to modern slavery.

In relation to the supply chain for Geberit Group the following steps are taken in order to ensure that modern slavery and human trafficking are not occurring anywhere in our supply chains:

Geberit's suppliers are obligated to maintain comprehensive standards. The basis for cooperation is the Code of Conduct for Suppliers, which is available in 15 languages, to which an Integrity Line for suppliers was added in 2017. The Code of Conduct is binding for every supplier. These include direct suppliers of raw materials and semi-finished products for use in production, as well as indirect suppliers such as those providing services or office materials. In 2022, the Code of Conduct was signed by 3,296 suppliers which equates to over 90% of the total procurement value. No incidents were reported via the integrity line for suppliers.

The Code comprises specific guidelines on quality and meeting environmental, labour law and social requirements and sets out compliance with human rights. The supplier must prepare appropriate documentation to demonstrate – upon request by Geberit – compliance with the provisions of the Code and ensure that these papers are available for inspection at all times. Should the supplier fail to comply with the obligations set out in this Code, then measures for improvement are implemented. Failure to comply on the part of the supplier is regarded as a serious obstacle to the continuation of the business relationship. If the supplier does not correct this non-compliance, Geberit can terminate the cooperation.

When evaluating suppliers, Geberit strives to achieve the greatest possible degree of transparency. All new and existing partners are thus assessed by means of standardised processes and according to the same criteria: company as a whole, quality, sustainability, price, procurement chain, delivery reliability, production and technology. As a rule, the selection of suppliers is required to include a quality audit covering clarification on environmental and occupational safety issues. Where an audit reveals inconsistencies in these criteria, an additional, in-depth audit is conducted.

Supplier management incorporates a risk management approach on environmental, occupational safety and human rights matters that is based on the assignment of suppliers to a particular risk class within a risk matrix depending on production location (country) and material group (type of production process). As such, suppliers in the highest risk category pose an increased risk both in terms of production location and type of production process. In 2017, suppliers and material groups that had been added due to the acquisition of Sanitec were systematically assessed and included in risk management. In addition, the classification of existing material groups into certain risk categories was reviewed. Since then, the risk matrix has been updated on an annual basis. When the matrix was updated in 2022, four third party Environment, Health and Safety audits were carried out at suppliers in China, Turkey, Bosnia and Herzegovina.

In 2022, 167 (down 4 on the previous year) existing suppliers at Group level were identified in the highest risk category, which corresponds to around 7% of the procurement value of Geberit Group. A systematic planning and performance of audits is conducted for these suppliers. To ensure neutrality and the expertise required for the audits, Geberit also works with an external partner. This tried-and-tested procedure has been carried out for years and makes an important contribution to ensuring compliance with the duty of care in the supply chain at Geberit. New employees in procurement also receive training in the process of sustainable procurement. Regular training of lead buyers on procurement and sustainability takes place, plus proactive exchanges with other industrial companies and participation in a working group of the UN Global Compact on sustainable supply chains.

Ethical sourcing is integrated in sourcing and purchasing in general. Head of Geberit Corporate Purchasing is Adriaan 't Gilde. Expert support is provided by the Corporate Sustainability unit.

Relevant policies

The Managing Director and the Board of Directors take responsibility for combatting modern slavery in the UK and ensuring awareness and internal accountability amongst UK employees. They are supported in this by the senior management team.

We make internal policies available to employees which help make them aware of the ways in which they identify modern slavery risks and the steps to be taken to prevent slavery and human trafficking in our operations:

Whistleblowing policy

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use the Company Integrity Line.

Employee code of conduct

Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier code of conduct

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Recruitment policy

We use only specified, reputable employment agencies to source. Furthermore through robust screening and new starter administration processes we evidence employee identity, career history and ensure their right to work.

Training

We require all UK employees within the Company to complete training on modern slavery when they join. All UK employees then complete a refresher course every two years as a module within our wider business compliance training programme.

Our modern slavery training covers:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- what external help is available, for example through the Modern Slavery Helpline

Effectiveness and Performance

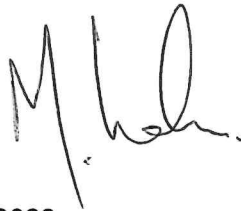
We have reviewed and will continue to review our existing policies and procedures as identified above in order to ensure that we are maintaining our effectiveness in combatting slavery and human trafficking.

We will continue to evaluate our performance of the above steps over the next 12 months by using the following key performance indicators:

- Recording and investigating any reports of Modern Slavery from within our team;
- Monitoring supplier acceptance of our human rights policy; and
- Undertaking audits on our supplier base and taking corrective action where required

This statement is made on behalf of Geberit Sales Ltd and Geberit Service pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2022.

MARK LARDEN
Managing Director
Geberit Sales Ltd



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