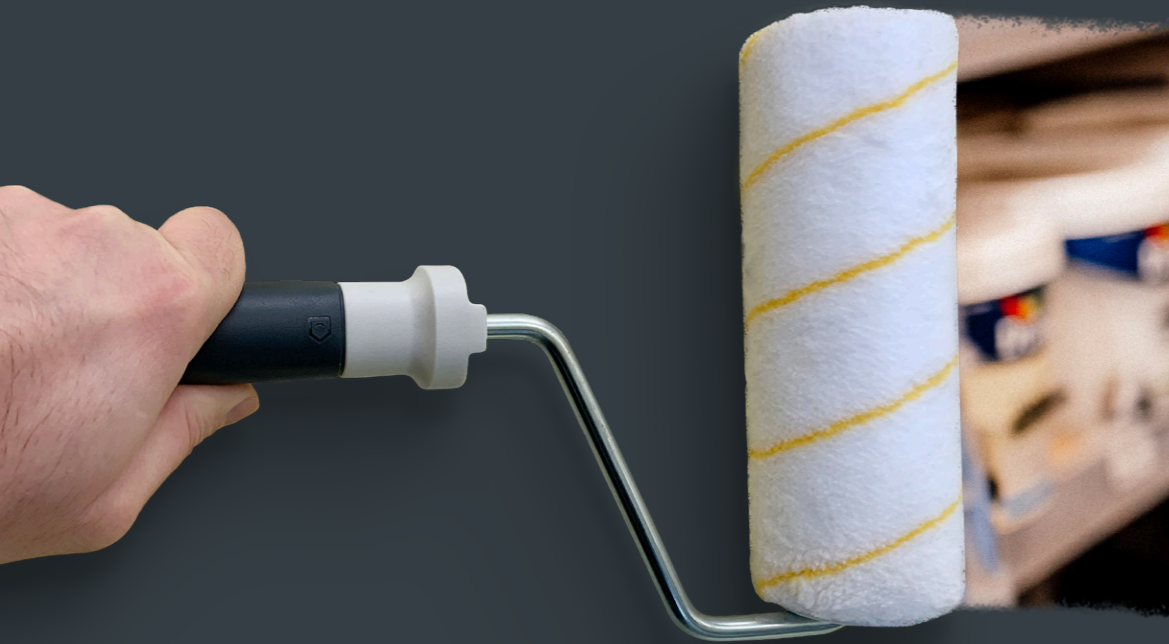


Modern Slavery Act

Transparency Statement
2023/24

Kingfisher



We continue to ensure respect for human rights is consistently applied throughout our business. We are working with colleagues, our supply chains, and relevant partners to ensure we identify and assess risk, apply due diligence, and take any necessary steps to deliver our human rights and modern slavery agenda.

Our commitment to address modern slavery risks starts at Board level and is embedded into key business processes.

About the statement

This statement has been published in accordance with the UK Modern Slavery Act 2015, which requires businesses to disclose the steps they are taking to tackle slavery, servitude and forced or compulsory labour and human trafficking (together known as modern slavery). It covers the six areas outlined in the Home Office guidance:

- Organisation structure and supply chains.
- Policies in relation to slavery and human trafficking.
- Risk assessment and management.
- Due diligence processes.
- Key Performance Indicators to measure the effectiveness of steps being taken.
- Training on modern slavery and trafficking.

This statement sets out the steps taken by Kingfisher plc and all its subsidiary undertakings inclusive of its UK operating companies and its UK retail banners, to prevent modern slavery in its own business and supply chain, for financial year ending 31 January 2024.¹

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¹ Data on ethical compliance audits (goods for resale and goods not for resale) are based on a 12-month calendar year ending 31 December 2023.

Our company structure

Kingfisher offers home improvement products and services to consumers and trade professionals across our 2,000+ stores, via our ecommerce channels, and through our franchise, wholesale and joint venture partners.

By delivering our strategy and operating as a responsible business, we create sustainable value for our customers, colleagues, shareholders, suppliers and wider society.

Banners, partnerships and marketplaces

Our distinct and trusted retail banners address diverse customer needs with different models, strong customer relationships and a clear positioning and plan. Each occupies number one or two positions in our key markets.

We continue to grow our business through different partnership models, including our joint venture in Turkey and wholesale and franchise models, and are rapidly progressing our curated online marketplaces for third-party merchants.

Better Homes. Better Lives. For Everyone.

At Kingfisher, we believe a better world starts with better homes and we strive to help make that happen.



Over 78,000¹
colleagues



Operations in
8 countries



Over 2,000¹
stores



£12.98 billion
of sales



14,500
supplier partners



All figures on this page relate to the year ended 31 January 2024.

¹ Turkey joint venture included. Total, not full-time equivalent.

² Kingfisher has 'Centres of Excellence' in supply chain, trade, compact stores, customer services, data, technology, and ecommerce and marketplace.

Suppliers and customer offer

Our 14,500+ global supply partners are categorised as either Goods For Resale (GFR) or Goods Not For Resale (GNFR).

This diagram provides an overview of our supply chains and the different ways we procure goods and services.

GFR
Goods For Resale 

OEBs¹
Own Exclusive Brands
(part of ethical compliance programme)

Designed, produced and/or sold by Kingfisher. Sourced by Group Offer and Sourcing (O&S) and sold across banners and through wholesale, joint venture and franchise partners.

433
suppliers

Non-OEBs²
Non-Own Exclusive Brands
(part of ethical compliance programme)


Local and national branded products supplied by suppliers that are sourced by banners or Group Offer and Sourcing (O&S) and may not be exclusive to Kingfisher.

2,272
suppliers

International Brands³
(Excluded from the ethical compliance programme, suppliers are required to manage compliance within their own supplier chains)

International Brands, like 3M and Bosch, are well-known products sold by other retailers and may not be exclusive to Kingfisher. These products are widely recognised and generally operate across multiple markets.

34
suppliers

GNFR 
Goods Not For Resale

Goods and services used by Kingfisher to run our business. This includes IT services and equipment, cleaning, security services and logistics.

11,847
suppliers

Third-party products, services and partnerships

Marketplace products and services, which are sourced by independent sellers and sold by third parties such as franchise and joint venture partners or independent tradespeople. These are made available through our partners or digital platforms.

Including:

- B&Q Marketplace
- Brico Dépôt Iberia Marketplace
- NeedHelp
- Koçtaş

¹ Own Exclusive Brand (OEB) refers to Kingfisher's own brands.
² Non-Own Exclusive Brand products carry the supplier's name but are not widely recognised brands in our markets. Eligibility is decided by, and is based on, elements including turnover, production locations and risk to Kingfisher. For suppliers with a low turnover (sub £50k p/a), we follow a letter of conformity approach.
³ International Brands are classified as products that carry a widely recognised brand in our markets and generally operate across more than one market. Selected branded suppliers that meet the internal eligibility criteria for classification as an 'International Branded Supplier' are invited by Kingfisher to submit a signed letter of conformance.

Governance

Responsibility for modern slavery and ethical sourcing is established at Board, Group and banner level.

Board and executive level

The Kingfisher plc **Board** has overall responsibility and accountability for the effective management of our modern slavery risks.

Our **Responsible Business Committee**, a committee of the Board and chaired by a non-executive director, supports and oversees the delivery of the Responsible Business strategy.

Group level

Our central **Responsible Business team**, led by our Director of Responsible Business, is responsible for developing our strategy and reporting on Responsible Business issues, including human rights. We have a dedicated Human Rights Manager who reports to our Head of Environment and Human Rights, and a Sustainability Manager who has a focus on GNFR. Our Human Rights Manager chairs the Human Rights and Modern Slavery Working Group.

Our **Group Offer and Sourcing (O&S) teams** drive the development and sourcing of OEB products and manage global relationships with our top International Brand suppliers. The teams are based at global sourcing offices in Asia and Europe.

Within O&S we have a dedicated **Ethical Compliance team**, responsible for implementing our ethical sourcing approach with OEB suppliers and their production sites in our sourcing countries. They also act as a Centre of Excellence (CofE) supporting our retail banners to implement our ethical audit programme for non-OEB suppliers.

Our **Group Procurement (GNFR) team** purchases the goods and services, with a spend of over £75k, we use to operate our business. Our GNFR Sustainability Manager works with the Procurement team to implement our ethical sourcing approach for GNFR.

Our **Group Compliance team** manages the colleague and vendor whistleblowing hotline as well as the pre-contractual Vendor Engagement Assessment for GNFR vendors and integrity assessment for GFR vendors. The Group Compliance team is also in charge of the Compliance training.

Banner level

Our retail banners develop the category strategies and product ranges for their own markets, to reflect local preferences, and source non-OEB products. Local Sustainability teams (supported by the O&S Ethical Compliance team) apply and implement our Group ethical sourcing policies and ethical compliance programme across production sites and suppliers.





Key committees and networks



Committees

Responsible Business Committee (RBC)

Purpose: A committee of the Board. Supports and oversees the delivery of our Group level Responsible Business strategy (including human rights), setting our ambition and monitoring progress.

Timing: Meets twice a year

Chair: Non-Executive Director (NED) Sophie Gasperment

Members: Kingfisher CEO, a second NED, the Chief Offer & Sourcing Officer, Chief People Officer, and the CEO of Screwfix.

Audit Committee

Purpose: A committee of the Board. Oversees the integrity of our financial and narrative reporting, the effectiveness of our internal controls, risk management and audit, as well as reviewing compliance matters.

Timing: Meets four times a year

Chair: Non-Executive Director (NED) Jeff Carr

Members: The Audit Committee is comprised solely of independent non-executive directors: Jeff Carr, Catherine Bradley CBE, Rakhi Goss-Custard and Bill Lennie.



Working Groups

Human Rights and Modern Slavery Working Group

Purpose: To monitor activities across the Group related to human rights and our approach to tackling modern slavery.

Timing: Meets 3-4 times a year

Chair: Group Human Rights Manager

Members: Include Responsible Business, O&S (GFR), Sustainability Manager (Logistics and GNFR), Supply & Logistics, Legal Compliance and Community functions. Colleagues from our Internal Audit/Risk, People, and Inclusion and Diversity functions also attend to challenge and hold the working group to account for its work on human rights and modern slavery.

Ethical Working Group

Purpose: To share best practices and discuss operational issues in relation to ethical sourcing and other sustainability topics.

Timing: Meets every 4-6 weeks

Attendees: Sustainability representatives from O&S, sourcing offices and banners as well as the Group Human Rights Manager.



Networks

Responsible Business Network

Purpose: To share ideas and best practices on Responsible Business including human rights and to raise awareness of identifying modern slavery risks. The group has welcomed external partners, such as Hestia and Slave-Free Alliance, to talk about modern slavery.

Timing: Monthly. Modern slavery topic discussed on an ad hoc basis.

Attendees: Colleagues from O&S, Sustainability, Procurement, Logistics, Brand, Investor Relations, Customer, Marketing and banners.

Business-Critical Surgery

Purpose: To discuss remediation and progress on any business-critical issues (the most serious breach of standards) found within our product supply chains. Also to share best practices, discuss approaches, and provide updates on ongoing cases. All activities are recorded in our Business Critical Tracker.

Timing: Meets every 6-8 weeks

Attendees: Sustainability leads from O&S banners and Responsible Business.

Policies

Our policy framework outlines the modern slavery and human rights rules and standards within our business and expectations for our suppliers and partners.

These policies, which have been approved by members of our Group Executive and apply to all suppliers (GFR and GNFR), are reviewed annually and updated where necessary. The Group Executive comprises the CEO and his direct reports, including the CFO, banner CEOs, and certain functional leads. This group meets monthly to support and advise our CEO to develop and implement the strategic direction of the Group and its constituent businesses, to make and implement operational decisions, and, where appropriate, to make Board recommendations.

Collectively, they help us implement our commitment to human rights and include:

Code of Conduct

The Code of Conduct applies to all Kingfisher colleagues, contractors and suppliers. It sets out personal and shared responsibilities for meeting high ethical standards, including a duty to report any potential breaches of the Code, and includes a section on modern slavery which states our commitment to human rights and ethical sourcing. It forms an integral

part of our contracts and we communicate it to suppliers via channels such as the Supplier Manual and Supplier Conferences.

Human Rights Policy

This is our key policy on modern slavery, which states our commitment to respect human rights, in line with international agreements and guidelines including: the United Nations (UN) Guiding Principles on Business and Human Rights; the International Bill of Human Rights (which includes the Universal Declaration of Human Rights); the UN Global Compact; the International Labour Organization's Declaration on Fundamental Principles and Rights at Work; the Children's Rights and Business Principles; and UN conventions on the elimination of discrimination.

The Policy also states our commitment to implement due diligence procedures to avoid infringing on the rights of others and includes a detailed section on ethical sourcing and ethical audits (see 'Working with suppliers' on page 9).

Supply Chain Workplace Standards

These set out minimum standards on labour practices and environmental practices that suppliers must abide by and which we check through our ethical audits (see 'Working with suppliers' on page 9).

They prohibit slavery and child labour and set expectations in areas such as health and safety, working hours and wages, and freedom of association.

These standards reflect the requirements of the Ethical Trading Initiative (ETI) Base Code and International Labour Organization (ILO) fundamental conventions on worker rights and align with the audit standards set by Sedex and Amfori BSCI.

Whistleblowing Policy

This states our commitment to provide a channel for colleagues and third parties, including suppliers, to raise any concerns securely, confidentially and without fear of retaliation including in relation to human rights and modern slavery (see 'Whistleblowing and escalation' on page 19).

You can read our Code of Conduct at kingfisher.com/codeofconduct and our Responsible Business policies at kingfisher.com/ResponsibleBusinessPolicies



Risk assessment

Given the size of our global supply chain, we adopt a risk-based approach, prioritising the most significant human rights and modern slavery risks.

Our ongoing due diligence processes continually mitigate and address human rights risks within our business and supply chains, and we collaborate with suppliers, peers, industry bodies, non-governmental organisations (NGOs) and governments to raise standards.

Across the Group

To focus our activities, we prioritise and frequently review the salient human rights risks identified as part of the saliency assessment (see diagram).

In 2023, we worked with Slave-Free Alliance, our third-party human rights partner, to identify good practice and areas for improvement across our operations and supply chain. We conducted a complete gap analysis and independent review of our understanding and approach to modern slavery and labour exploitation risks, taking into consideration relevant legislation and industry best practices.

Slave-Free Alliance engaged with the Human Rights and Modern Slavery Working Group and key internal stakeholders

including Responsible Business, O&S (GFR), Group Procurement Sustainability Lead, Logistics, Legal Compliance, Community, Internal Audit/Risk, People/HR, Inclusion and Diversity, and banner sustainability leads. We also consulted external human rights frameworks, external risk assessment tools, and the findings from our ongoing engagement with civil society and industry organisations.

Initial findings from the gap analysis identified the following key risks that may be present within our global GFR and GNFR supply chains: forced or compulsory labour, bonded labour, child labour, irregular employment, poor health and safety conditions, low wages, excessive working hours, forced overtime, barriers to freedom of association and collective bargaining, discrimination, harsh or inhumane treatment, and lack of supply chain transparency. Additionally, the salient human rights issues previously identified in our saliency assessment were confirmed as still relevant key risk areas within our supply chains.

To address the identified risks and vulnerable groups, an action plan was developed. The key recommendations from Slave-Free Alliance include:

- Updating our approach to human rights and modern slavery to reflect recent changes and the expansion of our New Business Models (NBMs).

- Adapting our strategy and approach in preparation for new European Union legislation, such as the Corporate Sustainability Reporting Directive (CSRD).
- Establishing a collaborative and consistent working approach that includes both the Group and our retail banners.

Going forward, the Human Rights and Modern Slavery Working Group will use the findings from the gap analysis and aim to incorporate them into our ongoing approach to tackling modern slavery.

We will continue to use the saliency assessment to inform our supplier engagement and our 'beyond audit' programmes, both of which look to tackle wider issues and root causes in our supply chain. More information on our approach to risk assessment in sourcing is included in '[Working with suppliers](#)' on page 9.

We have identified 10 salient human rights issues across our business and supply chains, as defined by the UN Guiding Principles Reporting Framework. These are:



Modern slavery



Child/underage labour



Freedom of association/
collective bargaining



Health and safety



Wages/
working hours



Land rights



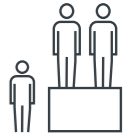
Depletion of
natural resources



Impact of
climate change



Air, water and
land pollution



Discrimination

The gap analysis process also helped us to identify vulnerable people groups that may be found within our supply chains and operations.

- Indigenous Communities
- Migrant Workers
- Minority Ethnic Groups
- Agency and Temp Workers
- Children and Young Workers
- Female Workers
- Remote/Isolated Workers



Managing risk within our operations and supply chains

Risk assessment for GFR

We use several risk assessment tools to identify, prioritise and mitigate risk within our product supply chains, particularly in the highest-risk countries, sectors and locations. These include:

- **Our ethical risk matrix.** Using data from Verisk Maplecroft, this is updated annually to help us identify the high-risk product areas and countries in our GFR supply chain.
- **Collaborative compliance platforms.** Sedex, Amfori BSCI, Dow Jones Risk Centre and EcoVadis allow us to access data on inherent risks related to country and industry sectors. The Sedex Self-Assessment Questionnaire (SAQ) enables us to risk assess suppliers and production sites, dependent on their responses.
- **Third-party ethical audit reports.** These provide information on the operations within the production site, including any issues found.

See 'Working with suppliers' on page 9 for more details on the ongoing audit programme and due diligence approach.

Risk assessment for GNFR

The key risk areas we have identified for GNFR include businesses providing contracted services such as construction, cleaning, security and logistics, particularly where labour providers are used.

Although we had carried out a risk assessment for GNFR previously, we wanted to make sure it still reflects changes brought about by the pandemic, Brexit, the cost-of-living crisis, international conflicts and other external factors. In 2023, we worked with Slave-Free Alliance to review and update this assessment and created the newly updated **GNFR risk matrix**. One example of change in the risk landscape, and why the update was so important, is the human trafficking of people trying to flee the conflict in Ukraine. The GNFR risk matrix highlighted several high-risk spend categories such as construction, recruitment and waste and recycling and will be used to inform our approach going forward.

We update the Board on any human rights issues on a six-monthly basis.

To monitor ongoing risks, we use:

- **Vendor Engagement Assessment (VEA),** used to conduct due diligence checks on new suppliers (with whom we have an estimated spend of over £5,000 or equivalent in local currency) and existing suppliers where there have been changes in the terms and conditions of their engagement.
- **EcoVadis Sustainability Assessment Platform,** which allows us to collect data on our GNFR suppliers' sustainability and ethical processes. We request that suppliers with an annual spend greater than £75,000 complete a regular EcoVadis Sustainability Assessment, in addition to the VEA process.

- **The newly-created GNFR risk matrix,** which we'll use to inform our risk approach going forward.

See 'Working with suppliers' on the following page for more details on our supplier assessment programme and due diligence approach.

Risk assessment for our operations

We have identified a low risk of modern slavery occurring in our business operations and among our direct employees, based on our human rights saliency assessment and our work with Slave-Free Alliance. Colleagues working in our offices and stores are protected by strong local employment laws as well as our own employment policies and practices.

Risks are higher for workers providing contracted services such as construction, cleaning, security and logistics, particularly where labour providers are used. These risks are managed through our ethical sourcing programme for GNFR suppliers (see page 15).

Risk assessment and due diligence for new acquisitions, partnerships and third-party suppliers

We expect all our digital marketplace, service providers, franchise, wholesale and joint venture partners to share our commitment to human rights and to uphold

our standards. In 2023, we updated our Human Rights Policy to clarify our position with regard to the ethical requirements our third-party marketplace suppliers must comply with. This is embedded in the marketplace Terms & Conditions, which detail the minimum requirements for all sellers on the platform. This includes a modern slavery clause, requiring all sellers/suppliers to report any identified cases of modern slavery. We also reserve the right to audit and investigate any potential cases. Specifically, this refers to our existing UK and Iberia marketplaces (ecommerce platforms where third-party suppliers can sell their products) as well as marketplaces due to launch in France and Poland. It also covers NeedHelp (an online digital platform offering customers DIY, handiwork, gardening and home improvement services), 80% of which is owned by Kingfisher, and Koçtaş. Kingfisher's 50% joint venture in Turkey. The same commitment is expected from Connect Distribution Services Limited (renamed Screwfix Spares), a leading retailer of appliance spares, accessories and consumables to tradespeople and consumers that was acquired by Kingfisher in March 2023. The purchase included the stock, intellectual property, contracts and fixed assets.

When we acquire new businesses or enter into new partnerships, we carry out due diligence and embed our Code of Conduct and our Human Rights and Responsible Business policies into the partnership agreements. This year, we worked on clarifying our position regarding marketplace

sellers. As a result, we added some clauses in the Human Rights Policy to state that marketplace sellers must comply with marketplace terms and conditions, which include clauses on anti-bribery and modern slavery.

We continue to address the challenges of new business models (NBMs) adopting our policies and processes, due to their business models being so different to ours. As part of the due diligence process, our Responsible Business team has been working closely with NBMs' internal and external stakeholders to identify risks.

Country risk assessment, global conflicts

We continuously monitor and assess risk on a country-by-country basis, taking into account any ongoing global conflicts. This informs our decisions on sourcing and whether we need to adapt our ethical compliance audit approach. For example, when a full ethical audit is not possible, due to country or global factors, we can accept Sedex virtual assessments (SVAs) for production sites. These assess labour standards and health and safety on site, excluding business ethics and environment questions.

Working with suppliers

GFR Goods For Resale



The products we buy to sell to our customers, whether they're OEB or non-OEB, are sourced from over 2,700 suppliers across 58 countries.

To ensure these suppliers adhere to our compliance standards we have continued to tighten our internal policies and requirements. For example, this year:

- Each banner has introduced permanent resources responsible for onboarding and verifying suppliers. Regular meetings now also take place with the banners to improve the quality of existing data.
- The Group has been issued thorough work instructions, showcasing what policy compliance is.
- A film and factsheet, detailing our compliance requirements, has been provided to new and existing suppliers. Both are available in six different languages.
- We've progressed in mapping the growers of our two largest OEB suppliers for horticulture and have addressed all critical and high-risk findings with the growers.

- We continue to monitor Self-Assessment Questionnaire (SAQ) responses from, and ask further questions to, suppliers affected by the ongoing conflicts in Ukraine, Israel and occupied territories. Face-to-face audits are not currently being conducted in these areas.

Our ethical audit programme scope and due diligence process is focused on directly sourced products, including **Tier 1** and **Tier 2** suppliers.

Tier 1

OEB, non-OEB and International Brand¹ suppliers with whom we have a direct business relationship

Tier 2

OEB and non-OEB production sites

Beyond Tier 2

E.g. growers, component/raw material providers

Tier 1: OEB and non-OEB suppliers

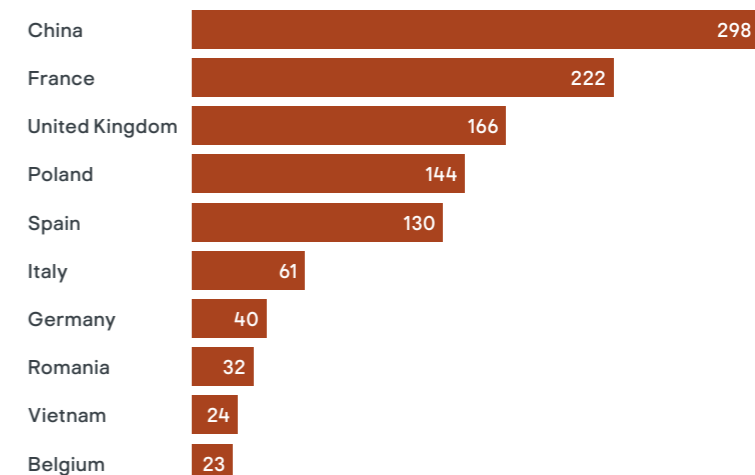
OEB suppliers, as well as non-OEB suppliers above a spend threshold of £50,000, must disclose all the production sites supplying us with finished goods. Suppliers share this information with us via collaborative social audit platforms including Sedex, Amfori BSCI and EcoVadis. For non-OEB suppliers below the spend threshold, we follow a letter of conformity approach.

This is an ongoing process, and we continue to work with our supplier partners to ensure their production site information remains in alignment with our Responsible Business policies and our ongoing commitment to improving transparency. 71% of suppliers are in compliance with policy requirements, an increase from 62% in 2022. For OEB suppliers, 92% are compliant, a slight decrease from 98% in 2022. This decline is primarily due to an increase in the number of suppliers, lapsed supplier memberships to social audit platforms, and some suppliers no longer working with Kingfisher. Our aim is to consistently achieve above 95% compliance to policy from our OEB suppliers, while our banners have action plans and targets to achieve this by the end of 2025/26.

Our central Sustainability team and banner level sustainability personnel share data on supplier and production site ethical performance through our Vendor Index and Site Index. These databases provide clear information on the suppliers and production sites disclosed, which banners they supply, and their alignment with our Ethical Sourcing Vendor Guidelines.

Top 10 supplier countries

Number of suppliers²



i In 2023:

2,705 of our suppliers were OEB and non-OEB suppliers.

71% of suppliers were compliant with our policies vs 62% in 2022.

92% of OEB suppliers were compliant with our policies vs 98% in 2022.

67% of non-OEB suppliers were compliant with our policies vs 57% in 2022.

¹ International Brand suppliers are not included in our disclosure and audit data.

² This is the number of suppliers registered on the Sedex platform. The total number of suppliers is likely to be higher.

Tier 1: International Brand and third-party suppliers

We have strengthened our requirements around International Brands in 2023. Suppliers are considered International Brands if they can confirm they have an ethical compliance programme in place, they continually carry out due diligence on their supply chain (including a third-party audit programme), and they monitor and mitigate any non-conformances found. They also need to declare they have someone in their organisation responsible for this area and must agree to have their programme assessed against Kingfisher's programme requirements as part of our random spot checks. International Brand suppliers, and our joint venture, franchise, wholesale and marketplace partners, must commit to implementing their own ethical compliance programmes in accordance with the law and our company policies.

Any International Brand suppliers that fail to demonstrate policy compliance are removed from our supplier list, while those deemed to have insufficient ethical sourcing programmes must be included in Kingfisher's own disclosure and ethical audit programme.

International Brand suppliers with modern slavery breaches have their International Brand status removed while they are investigated.

Tier 2: OEB and non-OEB production sites

Through our suppliers, we work with over 4,200 known production sites, across 70 countries, to manufacture our goods for resale (both OEB and non-OEB products).¹ The increase in supply chain visibility is a result of the collaborative efforts between the Group O&S team and the enhanced resources allocated within the banners. This includes training workshops and the creation of work instructions to help the banners manage compliance with policies for their production sites and suppliers. Additionally, the O&S team manages and supports Hybrid Suppliers, who supply both OEB and non-OEB products.

Our policies require suppliers to disclose their production sites as part of the ongoing ethical audit programme. This requirement includes suppliers registering the production site details on Sedex and Amfori BSCI, and sharing full ethical audits the production site has undergone in the last two years.

We continue to work with our suppliers to disclose their production site information, which is in alignment with our policies and our ongoing commitment to improving transparency.

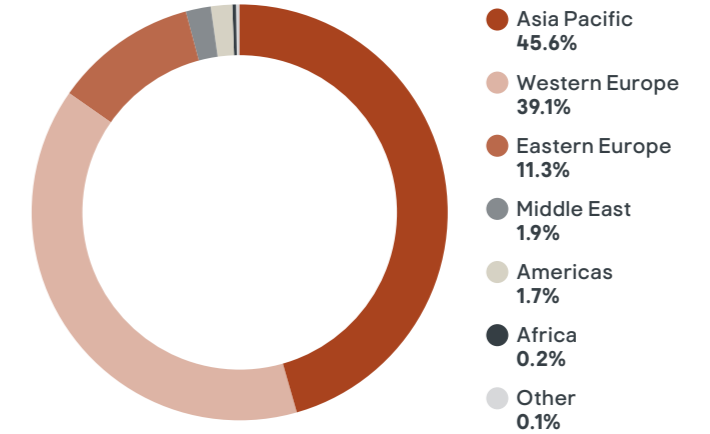
i In 2023, we had:
4,226 declared production sites.
85%² of declared production sites comply with our disclosure requirements vs 64% in 2022.
Over 750,000 people working at our declared production sites.³
39% female workers and 61% male workers.³

Tier 2: Production site due diligence

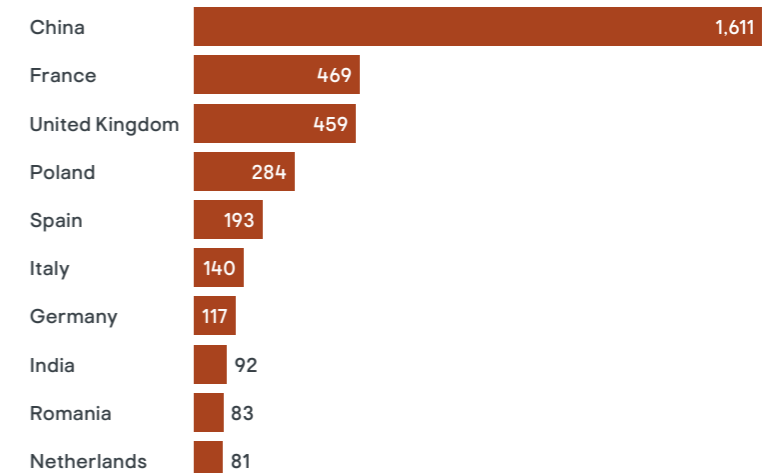
Our supplier engagement and ethical audit programmes are designed to improve ethical standards in our supply chain.

Our due diligence for modern slavery issues also includes ethical risk assessment processes (page 8), supplier training and engagement (page 18), and collaboration with human rights experts and others in our sector (page 22).

Sourcing by region Number of production sites



Top 10 supplier countries Number of production sites



1 This is the number of production sites disclosed to us via Sedex or other platforms. The total number of production sites is likely to be higher.
 2 In 2023, the introduction of a new SAQ (Self-Assessment Questionnaire) on Sedex meant that tracking the requirement for suppliers to complete the SAQ to 100% was not possible. For the 2023/24 reporting period, production sites will be monitored for audit and disclosure requirements, excluding SAQ completion. As SAQ scores could not be tracked in 2023, compliance cannot be directly compared with 2022.
 3 This refers to production sites linked to Kingfisher on Sedex. The actual number of workers at declared production sites is higher.

Ethical compliance process

Our ethical compliance process is the same for both sites producing Kingfisher-branded or – above a spend threshold of £50,000 – non-OEB products.



¹ If a supplier has an existing ethical audit from the following list of audit standards it may be accepted: SA8000 – Social Accountability 8000, FLA – Fair Labour Association, ICTI – International Council for Toy Industries, Intertek Workplace Conditions Assessment (WCA) Report, MPS-SQ (must have the SQ component), RBA – Responsible Business Alliance, Global Gap GRASP.

² A non-conformance refers to not meeting specified standards or expectations, often detected by internal audits or inspections. A non-compliance is a confirmed breach of a local, national, or international law or the ETI (Ethical Trade Initiative) base code.

³ 'Business critical' applies to situations that pose the most serious risk to people and our planet, like child labour and circumstances where workers or the environment are in imminent danger. 'Critical' refers to a systemic, deliberate, or severe breach of the audit code or local law which represents a danger to workers or others, or which denies a basic human right, or an attempt to pervert the course of the audit. 'Major' relates to a systemic breach of the audit code or local law that could present a danger to workers or violate a human right. 'Minor' refers to an isolated breach of the audit code or local law which represents low risk to workers or a policy issue. 'Observation' is a practice which does not break the law or standard but, if not corrected, could lead to a non-conformance.

Ethical compliance audit requirements (for all sites categorised as high risk)

Roll-out and effectiveness of measures

Ethical audits review production site performance and identify any instances of non-conformance with our standards relating to labour practices and human rights, health and safety, business ethics and environmental performance.

i Total number of declared production sites identified as high risk **2,154**

Total number of audited high-risk production sites in the past two calendar years **1,783**

The auditor will produce an audit report, including a Corrective Action Plan, in which they will identify any non-conformances, stipulate what needs to be done to address them, and recommend a timescale for closing them out (which will vary according to the type of non-conformance). Sites are required to implement any corrective actions accordingly and report progress to their auditor.

We work with suppliers and production sites to address and close the audit non-conformances, prioritising the most critical issues. Once complete, the site should verify their corrective actions and improvements with the auditor via a desktop review and/or a follow-up audit.

In 2023, we increased the number of audits conducted at high-risk production sites, a direct result of the increased visibility of our suppliers. This improved visibility allowed us to map and link to more production sites. Suppliers located in high-risk areas or producing high-risk products are now required to conduct factory audits. The additional resources within the banners have enabled us to review and record these audit results effectively. The result is more high-risk production sites undergoing an audit, significantly improving our supply chain visibility and transparency.

Remediation

We track audit findings and progress on remediation to monitor the effectiveness of our ethical compliance programme.

Within the last calendar year, we have worked with our supplier partners and production sites to close 48% of the identified non-conformances. We continue to monitor and work in collaboration with production sites to address outstanding issues, through our ongoing audit programme.

i Top five non-conformances by category (GFR)

This table shows the top five non-conformances by category for all SMETA ethical audits carried out in the past two years. Most non-conformances relate to health and safety, which includes fire safety issues such as the provision of fire extinguishers and fire exits. Other common non-conformances include working hours, wages, management systems and environmental factors.

Non-conformances	Number
Health, safety and hygiene	4,234
Working hours	806
Wages	508
Environment	365
Management systems	325

We also track non-conformances under the heading 'employment is freely chosen', of which there were 58 in 2023. Findings under this heading range from lack of policies through to instances of forced, bonded or involuntary labour and worker recruitment fees. We have resolved all business-critical issues under this heading. Refer to 'Addressing business-critical issues' for more information regarding our approach.

Note: data covers production sites disclosed to us that are registered and linked to Kingfisher on Sedex with active purchases for 2023.



Addressing business-critical issues

In 2023:
97¹ production sites did not meet our minimum standards (i.e. they achieved a business-critical grade), of these:

77 production sites improved from business critical.

11 production sites submitted corrective actions which are pending auditor approval, or we are working with them to make the required improvements.

9 production sites we are no longer sourcing from.

Production sites are risk-rated as 'business critical' if auditors uncover one or more business-critical non-conformances, or four or more 'critical' non-conformances. Business-critical non-conformances represent the most serious breach of standards. If there are any business-critical non-conformances identified from the audit, the supplier or production site is required to take decisive and swift action. We will not place new orders with existing sites, or start working with new sites, that have business-critical non-conformances and we will suspend existing orders until these are resolved. Only as a last resort, we will cease to trade with production sites or suppliers if they don't work with us to address business-critical issues.

When a business-critical issue is identified, we require suppliers to act immediately to ensure the welfare of workers. We take the following steps:

- **Escalation and notification:** A member of our Ethical Compliance team will ensure the correct people are notified internally and externally. Our escalation and notification process is reviewed annually.
- **Remediation:** Our Responsible Sourcing team works with key internal stakeholders, as well as the supplier and production site, to manage and address the issues identified through a Corrective Action Plan. We agree on a timescale for implementation.
- **Engagement:** Depending on the nature of the issue, a member of our O&S team or Quality team may visit the production site to help with the remediation plan. We engage with the production site throughout the process and work to ensure the wellbeing of workers is prioritised.

- **Close-out:** We require third-party confirmation, via a follow-up ethical compliance audit or desktop review, that the issues identified have been resolved. We use a tracker to monitor suppliers identified as having business-critical non-conformances. Any production sites with business-critical non-conformances are recorded as 'open' until an ethical compliance audit confirms the issues have been addressed and the case is then 'closed'.
- **Follow-up:** We continue to work with and monitor the production site post-incident. We carry out regular follow-up audits to ensure production sites comply with our standards.

Beyond Tier 2: Indirect suppliers

Our extended supply chain includes many more indirect suppliers, including suppliers of raw materials and component parts used in the products we buy and sell.

We continue to map our indirect supply chain and are working on several projects to improve standards, prioritising indirect supply chains according to our saliency and risk assessments. See ['Going beyond audit: addressing our salient human rights issues'](#) on page 17 for examples.

“We engage with the production site throughout the process and work to ensure the wellbeing of workers is prioritised.”

¹ During 2023, we ceased working with nine business-critical production sites for various reasons, including the completion of business contracts and changes in sourcing requirements. In two of these cases, we made the decision to stop trading with the sites as a last resort due to their failure to collaborate with us in remediating identified issues.

Addressing cases of modern slavery

Any potential instances of modern slavery or child labour identified via ethical audits are considered business critical – the most serious breach of our standards. We take immediate action to resolve such cases, working with suppliers to ensure they understand our requirements, the corrective actions needed, and how to implement them.

The following examples are cases identified in 2023 through the ongoing ethical audit programme:

i Bonded labour B&Q Ethical Sourcing team

An ethical audit in Taiwan found bonded labour in one of its production sites. This is when individuals are pledged to work either for a money lender or a landlord to repay a debt or loan.

In this case, a group of 17 foreign migrant workers were made to pay recruitment fees in their home country and pay ongoing fees when they arrived in Taiwan (service fees: TWD 1,500 per month (approx. 37 GBP), health exams: TWD 1,700 per time (approx. 42 GBP) and work permits: TWD 3,000 (approx. 74 GBP) every three years). This dated back to 2019.

All forms of modern slavery within our supply chains are strictly prohibited and, in line with our business-critical procedure outlined on page 13, orders were immediately suspended. The B&Q Ethical Sourcing team worked with Amfori BSCI in collaboration with other retailers to support the supplier to set up a reimbursement plan to pay affected workers back in instalments and implement new restrictions on foreign workers' recruitment-related fees.

By October 2023, all the fees had been reimbursed and the case was closed.

i Health and Safety Group O&S

A business-critical non-conformance was identified during an ethical compliance audit of a production site in China, which covered 10 buildings, with a total of 32 safety exits.

On inspection, seven fire exits were found to be locked during work hours. This presented a health and safety risk to workers. Our Responsible Sourcing team from our Far East office worked with the supplier on remediation, making sure all fire exits were opened. This was followed with preventative action, making sure those responsible were made aware of the reasons the doors needed to remain open and trained in relevant safety issues. They were also asked to update their policies and rules.

An external auditor re-audited the site to confirm the corrective actions had been satisfactorily implemented and then closed the issue.

i Excessive working hours Screwfix Ethical Compliance team

An ethical audit was carried out at a production site in China. This revealed a pattern of excessive working hours, with workers doing up to 136 hours' overtime per month. Workers were also observed to be working up to 29 consecutive days without a day off.

The Ethical Compliance team at Screwfix worked closely with the supplier, challenging them to conduct a thorough Root Cause Analysis (RCA) to ascertain the underlying reasons behind their non-conformance. In doing this the supplier discovered that shifts were not being utilised effectively and an increase in smart technology had led to more demand being put on workers.

As a result, a new shift pattern was created that reduced overtime and simultaneously a wage increase was put in place to minimise financial detriment to the workers. Additional workers were also brought in to reduce the risk of excessive overtime.

A follow-up audit validated the effectiveness of the RCA and the resulting actions taken by the supplier. The non-conformance was closed out.

i Health and Safety Screwfix Ethical Compliance team

The Ethical Compliance team at Screwfix worked with a production site in India after an ethical audit found childcare facilities significantly compromising children's safety. The site crèche had no washing facilities and was in an unsafe location.

The team worked with the supplier to find a solution. As a result, the crèche was moved to a larger room which had more facilities and was in a safer area.

A follow-up audit verified the changes to be sufficient and closed out the non-conformance.

GNFR

Goods Not For Resale



These are the goods and services we use to operate our business, such as IT equipment, cleaning, security services, and logistics. They're sourced from over 11,800 GNFR suppliers in our direct (Tier 1) supply chain.

We continue to work with suppliers to ensure they comply with our policies. Progress has been made this year in a number of areas:

- Due to the changed global landscape, we have investigated and interrogated our risk within our GNFR supply chain with the help of Slave-Free Alliance, to create our GNFR risk matrix. This piece of work has identified high-risk categories and will be used to inform our approach going forward.
- We have a new EcoVadis Improvement Programme, which focuses on supporting our suppliers to improve their EcoVadis scores. While still in its early stages, we have contacted several suppliers who have been targeted for improvement.

- We have developed bespoke in-house modern slavery training to help Group procurement colleagues identify potential cases of modern slavery and understand what to do if they have concerns. Members of the Responsible Business team attended the Procurement team day to help raise awareness of sustainability and the intersections in their roles, including a focus on human rights.

In 2023, we sourced from over 11,800 GNFR suppliers, a reduction from the 14,145 suppliers we worked with in 2022. This change is due to several factors, including ongoing efforts to identify and eliminate duplicate supplier accounts, as well as variations in our spending patterns.

All new GNFR suppliers must adhere to our Responsible Business policies as part of the contract negotiation process, and we embed human rights criteria into new supplier contracts. The supplier assessment programme for GNFR has two phases, depending on the supplier's annual spend.

Phase 1: Vendor Engagement Assessment (VEA)

Our Vendor Engagement Assessment (VEA) tool is used to conduct due diligence checks on GNFR suppliers. It must be completed before we buy any GNFR goods or services above £5,000 (or equivalent in local currency) for annual recurrent or one-off estimated spend with:

- A new supplier (VEA takes place during the tender process before the contract is signed).
- An existing supplier where the contract conditions have changed, for example due to a large change in scope of work, goods/services to be provided in a different country, or a different estimated spend.

The VEA process screens for:

- Integrity (e.g. risks of payment of bribes by third parties representing Kingfisher).
- Data protection (e.g. processing of customer and colleague personal data by third parties).
- Information security (e.g. protection of Kingfisher data to be shared with or accessed by third parties).
- Ethical practices (e.g. modern slavery, labour conditions).
- Credit check (for contracts above a spend of £75,000 or equivalent in local currency only).

There are specific sustainability questionnaires for specific high-risk categories, for example waste and logistics.

The VEA process includes a due diligence screening service provided by the Dow Jones Risk Centre platform to check for adverse media relating to the potential supplier as well as other red flags such as bribery and corruption, economic sanctions, and association with PEPs (Politically Exposed Persons). We receive alerts regarding any new risks and any concerns are identified and followed up.

If there is a significant regulatory change (such as recent Russian sanctions) new questions are added to the VEA to protect us.

We are working on a new version of the VEA to automate some elements and cover different processes for GNFR and GFR suppliers. We are integrating our new tool with some of the systems we use for due diligence processes, particularly Dow Jones and One Trust, and will use the tool to send questionnaires to suppliers.

This new tool is fully developed by Kingfisher for Kingfisher, in our Global Business Services centre in Krakow. This means we can add new due diligence elements if we wish.

Phase 2: EcoVadis Sustainability Assessment

We request that suppliers with an annual spend greater than £75,000 complete a regular EcoVadis Sustainability Assessment as part of the tender process, in addition to the VEA process.

EcoVadis is a third-party assessment tool and collaborative platform, used by more than 100,000 companies. It covers four themes:

- Labour and human rights
- Environment
- Business ethics
- Sustainable procurement

Supplier assessments are reviewed by EcoVadis and a scorecard is provided highlighting strengths, weaknesses and risk areas.

EcoVadis also provides participating companies with a rating medal based on the percentile rank of the company's score and minimum theme score. These, for the majority of the reporting year, range from Bronze for the top 50% of companies to Platinum¹ for the top 1%.

Suppliers who do not meet the EcoVadis Bronze rating must put an action plan in place to improve and complete a re-assessment within 12 months. We expect them to reach, at least, Bronze level within a year of the assessment. Silver, Gold and

¹ Platinum - Top 1% (99+ percentile). It compares a company's performance with all rated companies in our database over the previous 12 months. The percentile rank is calculated across all companies in all industries, not per industry.

Platinum-rated suppliers only need to re-assess every other year.

This year, we have put in place the EcoVadis Improvement Programme to help Kingfisher’s suppliers improve their EcoVadis scorecard. We identified approximately 92 suppliers to improve, and we are working through contacting them. So far, we have contacted 30.

We have also run all our suppliers’ tax codes through the EcoVadis system, to find any suppliers that have not shared their EcoVadis scorecard, and are currently working on a new EcoVadis campaign, targeting the top 100 suppliers by spend who are not currently on EcoVadis, encouraging them to join.

Monitoring progress

We continue to monitor progress of all suppliers who have been EcoVadis assessed. In 2023, this amounted to 75% of in-scope GNFR spend (annual spend over £75,000), compared with 79% in 2022. As this metric is tied to our spend it can fluctuate year by year, with certain large spends making a significant impact.

	Assessed	Not assessed
Mid 2023	837	1,345
End of FY2023/24	813	1,277

We have also decreased the number of suppliers with a spend of over £75k, meaning we have seen a reduction in assessed and not assessed suppliers.

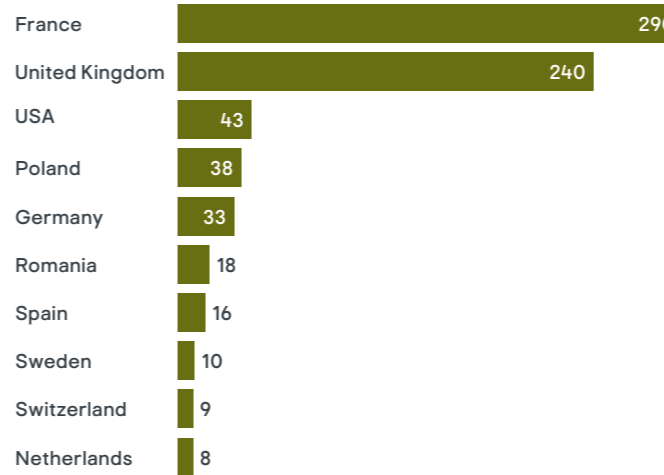
However, we have slightly increased the percentage of suppliers assessed from 38% (mid 2023) to 39% at the end of the FY 2023/34. In addition, 64% of suppliers who were re-assessed by EcoVadis improved their score, through changes to their internal processes, reporting and systems. In total, 80% of suppliers improved or maintained their score. We plan to increase the number of suppliers assessed by EcoVadis (see ‘Looking to the future’ on page 24).

Labour and Human Rights

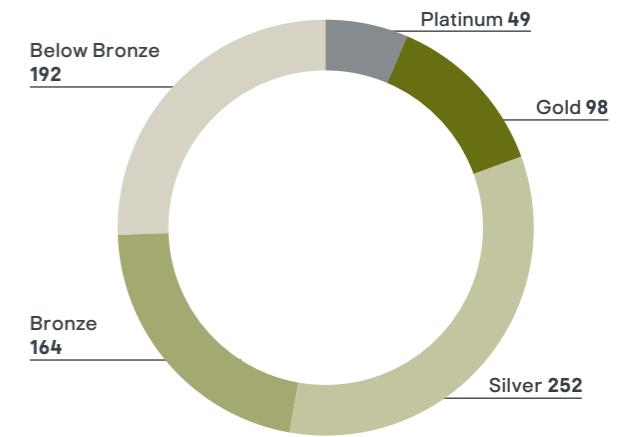
The EcoVadis assessment has a key theme of Labour and Human Rights which includes child labour, forced labour and human trafficking, working conditions and stakeholder engagement on human rights. Questions are asked about company human rights policies and governance and whether they have nominated colleagues with responsibility for human rights.

We are integrating a ‘right to audit’ clause into new contracts with GNFR suppliers. Having completed the GNFR risk assessment, using the updated risk matrix, we are now working to understand the resulting action plan (see ‘Risk Assessment’ on page 8).

Top 10 supplier countries assessed on EcoVadis
Suppliers by country/territory



EcoVadis medals
Scored suppliers

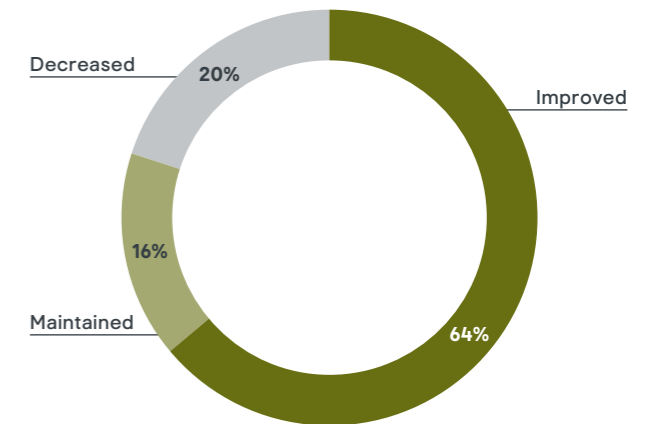


EcoVadis Improvement Programme

The programme has several elements. We are prioritising working with our current underperforming suppliers, highlighting areas to them that could be good to improve on, and asking them about their plans and actions for change. We are then offering to have individual meetings to discuss any elements of support we could provide (at the time of writing we are awaiting feedback from the first set of suppliers).

Next, we will be targeting our existing suppliers that do not currently have an EcoVadis assessment, starting with the top 100 by spend. The campaign will raise awareness of the EcoVadis assessment and give them reasons to complete one.

Evolution of re-evaluated suppliers
Assessment score



Going beyond audit: addressing our salient human rights issues

While playing an important role in improving supply chain standards, ethical audits alone may not address the root causes of non-compliance with our policies. We are therefore initiating and supporting projects that encourage wider positive change within our supply chains.

The following programmes focus on addressing the identified salient human rights issues and seek to mitigate modern slavery risks, build supplier capacity, and enable direct engagement with workers in our supply base.

Our current programmes

Programme	About	Salient human rights issue/s	Partner/ Internal team	Impact
Responsible recruitment of migrant workers	Creating a programme aimed at resolving recruitment fee issues and eradicating debt bondage, or bonded labour, from our supply chains.	Modern slavery	Far East Buying Office and Elevate	We identified issues with 14 suppliers in three countries. By the end of 2023, 10 of these had been resolved. We are working with the remaining four.
Tackling excessive overtime	Developing an effective way of grading overtime hours so we can start to support suppliers with extreme overtime issues.	Modern slavery	O&S and twentyfifty	Using twentyfifty guidance to put corrective action plans in place with the suppliers, prioritising those that have the most extreme overtime issues.
Horticulture deep dive	Mapping our horticulture supply chain beyond Tier 1 by asking our two largest OEB plant suppliers and distributors to share an assessment survey with their growers.	Modern slavery and working conditions	O&S EMEA and twentyfifty	The questionnaire identified 18 potential risk areas at 61 growers. For high or critical risk growers, we conducted further assessments on the risks associated with these suppliers.
Addressing electroplating concerns	Conducting an environmental health and safety (EHS) audit of our Tier 2 or Beyond Tier 2 Chromium 6 electroplating sites.	Health & safety	O&S Far East Buying Office	EHS audits have been completed at the top 30 suppliers with electroplated products.

i Indirect suppliers

To ensure all indirect manufacturing suppliers (Tier 2) meet our minimum ethical requirements, our Responsible Sourcing team from our Far East office collaborated with the Hand Tools & Hardware category leads. Our aim was to create a clear supply chain map to rule out any cases of modern slavery, child/underage labour, discrimination, or breaches of wages and working hours. To do this we implemented two approaches:

1. We requested that all Shanghai Buying Office OEB indirect suppliers provide valid ethical audit reports or Self-Assessment Questionnaires (SAQs) to help us assess their ethical performance and ensure they meet the required standards.
2. We also assisted our Tier 1 OEB suppliers in setting up their own social responsibility self-management systems to effectively monitor and control the ethical performance of all their suppliers.

By implementing these systems, we can ensure that ethical requirements are met throughout the entire supply chain. In total we collaborated with 14 direct suppliers and 215 indirect suppliers in 2023. They provided 120 ethical audit reports and 95 Self-Assessment Questionnaires (SAQs). Three independent third-party audits were also conducted to verify the effectiveness of the direct suppliers' systems in managing their suppliers. All audits met Kingfisher's requirements.

Supplier engagement

We have an ongoing supplier engagement programme and provide training to help suppliers build their knowledge and understanding of human rights issues and how to develop their approach to managing and mitigating human rights and modern slavery risks.

In 2023, we created a supplier digital hub and ethical onboarding film to showcase the broad benefits of being an ethical business such as stakeholder trust, employee retention and increased productivity. The film and factsheets explain Kingfisher’s ethical requirements, including our audit grading matrix, what a non-conformance is, how to resolve it, timeframes, and the collaborative support available to our suppliers and sites.

The six-minute video – which has been translated into five languages – provides information to support suppliers on their journey to achieving ethical compliance. It has been shared with our banners and Buying Offices, and our sourcing colleagues have been asked to share it with suppliers and prospective production sites.

We sponsor the Responsible Recruitment Toolkit developed by Stronger2gether (an industry collaboration) to provide free training and support to suppliers and labour providers. The toolkit provides good practice guidance, based on global standards, and includes a self-assessment

process to help suppliers monitor and improve progress on responsible recruitment among their labour providers. We provide information about the toolkit to both GNFR and GFR suppliers.

Further examples of our supplier training include:

Our supplier training

Training	Description of supplier training	Training provider
General Corporate Social Responsibility (CSR) training	We trained suppliers about our ethical, wood & paper and Sustainable Home Product requirements and policies, why they’re important and why we ask for the information we do. The training also covered the practicalities of registering on Sedex/Amfori BSCI and how to complete the Wood and Paper Excel file, as part of our Responsible Sourcing requirements.	Castorama France and Brico Dépôt France Quality team (ethical included), and Kingfisher France CSR team
Specific Corporate Social Responsibility (CSR) training	We ran further supplier training in September 2023 about upcoming regulations (EU Deforestation Regulation for wood and paper, and Corporate Sustainability Due Diligence Directive for ethical).	Castorama France and Brico Dépôt France Quality team (ethical included), and Kingfisher France CSR team
Responsible recruitment training	We introduced the subject of responsible recruitment including the definition of forced labour, the global trend of requirements for responsible recruitment, audit requirements, management of foreign migrant workers, Kingfisher’s policy and project roadmap, and potential solutions.	Far East Buying Office Responsible Sourcing team
Indirect supplier control	We explained how to establish a management system to monitor and control the ethical performance of suppliers.	Far East Buying Office Responsible Sourcing team

Whistleblowing and escalation

At Kingfisher, we are committed to maintaining an open culture with the highest standards of honesty and accountability, where colleagues and suppliers can report any ethical concerns safely and without fear of retaliation. These include modern slavery and any other human rights violations.

Our approach includes:

- **SpeakUp Hotline:** This year, we are refreshing our communication campaign to continue to keep awareness of our reporting channels (including our independent and confidential whistleblowing hotline) high among our banner and Group functions colleagues. The number of SpeakUp reports has consistently increased in the last few years, following stronger communication and training, and we expect the new campaign to continue to enhance awareness and improve reporting. See ‘SpeakUp’ on kingfisher.com.
- **Training:** We review our Code of Conduct compliance training annually which includes a specific section on modern slavery. This will help colleagues understand the types of issues they can report to the hotline.

- **Investigation:** All reports to the hotline are reviewed and, where necessary, investigated. Non-sensitive cases are investigated by the respective banner, and the outcome is reported to the relevant local Ethics and Compliance Committee as well as being reviewed by Central Compliance on an ad hoc basis. Sensitive cases are investigated at Group level and reviewed by the Group Ethics and Compliance Committee.
- **Board oversight:** The Board and the Audit Committee of the Board receive regular updates on whistleblowing reports, cases and trends.

Our Code of Conduct and Supply Chain Workplace Standards, as well as our ethical audits, include requirements for suppliers to provide a means by which workers can openly communicate and share grievances with management, without fear of reprisal, intimidation or harassment.

There were three reports relating to modern slavery made via our whistleblowing hotline in 2023 and all of them have been resolved.

Modern slavery escalation procedures

We have established a protocol for handling any incidents of modern slavery, to ensure we respond quickly, effectively and consistently. This involves escalating issues to senior director level, gathering

information and investigating non-compliances, as well as a process for deciding further action or escalation. The protocol means we can coordinate a quick response to any concerns raised. It has been communicated to the relevant people in our Risk, Legal and Compliance, and Sourcing teams.

i Addressing a whistleblowing case

An ethical audit at a UK production site manufacturing high-risk¹ products highlighted several issues including low-level verbal abuse between colleagues, poor management communication and favouritism. The audit also identified issues with health and safety involving the absence of fire alarms and machine safety. Following the audit, a call was logged on our whistleblowing hotline.

After an initial meeting with the site to discuss the audit findings and allegations of employee bullying, a follow-up audit was arranged with a third-party audit company. This involved extensive interviews with randomly selected workers (both in groups and individually). Due to the nature of the whistleblowing complaint, the audit was shadowed by a member of the Kingfisher Ethical Compliance team.

The interviews showed improvements in communications had been made. Management had introduced weekly team shift meetings and monthly meetings with supplier management which workers felt had helped relationships within the teams. A Dignity & Respect/ Discrimination training session had taken place for both workers and management and a further follow-up action was agreed to clarify and communicate the bonus structure with employees. The health and safety issues were resolved by introducing more maintenance workers for their machinery and introducing weekly health and safety meetings with shift managers.



¹ We use several risk assessment tools to identify, prioritise and mitigate risk within our product supply chains, particularly in the highest-risk countries, sectors and locations.

Employee training and awareness building

We maintain a regular training programme across the Group to ensure colleagues understand modern slavery risks and how to report concerns.

Training is delivered through digital e-learning modules, interactive specialist workshops and awareness presentations. This year, new joiners in the Far East (25 colleagues) were given ethical compliance training when they joined and eight colleagues from our Buying team in Vietnam have received a refresher course.

Slave-Free Alliance also ran a one-day modern slavery workshop for colleagues who work with suppliers or manage ethical trade programmes. This covered the current risks around slavery, the link between climate and labour exploitation, and responsible purchasing practices.

Post-training feedback is used to update and improve our training provision. To make sure our training is as relevant as possible for colleagues, we also use insights from reports to our SpeakUp channel.

Training activity in 2023

Our training programme reached over 700¹ colleagues in a variety of roles during 2023.

Training title/Topic	Description of content	Who is the training for?	Training provider
Ethical training	This training helps buyers better understand our ethical approach when negotiating with suppliers.	Castorama France buyers	Castorama France Ethical team
Modern slavery workshop	A one-day workshop on modern slavery, held in September 2023. The workshop covered the current risks around slavery, the link between climate and labour exploitation, and responsible purchasing practices.	People who manage ethical trade programmes or who work with suppliers including the Responsible Business (RB) team, O&S, and sustainability/ethical trade banner teams	Slave-Free Alliance
General Corporate Social Responsibility (CSR) training	This training helps Market Managers understand our CSR approach and the importance of our ethical policy including our requirements for suppliers.	Castorama France Market Managers (in the decoration, building and outdoor teams)	Castorama France Sustainability team
Themed CSR training	We ran a quarterly internal workshop designed to onboard teams and help them understand our ethical and wood and paper policy processes and Key Performance Indicators (KPIs).	Brico Dépôt France buyers and Market team	Brico Dépôt France Ethical team
Sustainability refresher training	Refresher training on what the RB strategy is and how it affects Group procurement, including EcoVadis actions along the tender process, and a deep dive into EcoVadis.	Group Procurement	Responsible Business team and EcoVadis
Modern slavery e-learning	Introductory awareness training on what modern slavery is, how to identify the signs, and what to do if you suspect someone of being a victim of modern slavery.	Group Supply & Logistics	Internal
Group Procurement team meeting workshop	Introduction to our RB strategy with a focus on climate and human rights. Included a section on how RB and Group procurement work together and why sustainability clauses are important.	Group Procurement	Responsible Business team

¹ Total attendees counted for each training session; some employees may have attended more than one session.

Training activity in 2023 continued

Training title/Topic	Description of content	Who is the training for?	Training provider
Overview of ethical sourcing	Mylo online learning module covering our responsibilities to limit negative impacts. This includes understanding who our suppliers are, how we do business and what standards they operate by.	All colleagues involved in range and supply activities for both OEB and non-OEB	O&S EMEA Ethical Compliance team
New staff training	Training for new Far East Buying Office staff who joined Kingfisher in 2023.	New Far East Buying Office staff	O&S Shanghai Buying Office and Hong Kong Human Resources Department
Training for Vietnam Buying Office	Presentation of the ethical compliance responsibilities and working flow.	Vietnam Buying Office colleagues	Far East Buying Office Responsible Sourcing team
Responsible Business Network Meeting 2023	An overview of Hestia's work in supporting victims of modern slavery and the challenges they face in their work. Included actions Kingfisher colleagues can do to help.	Kingfisher staff (Group and banners)	Hestia
Responsible Business Network Meeting: Anti-Slavery Day with United Nations Global Compact Network UK	The Social Sustainability team at the United Nations Global Compact Network UK spoke about their key projects addressing human rights and modern slavery, such as their working group on child labour.	Kingfisher staff (Group and banners)	Social Sustainability team at the United Nations Global Compact Network UK
Ethical sourcing requirements training	An internal workshop to support the Buying team in understanding our ethical sourcing requirements and processes.	All B&Q Buying teams	B&Q Ethical Compliance team

Updating our internal ethical processes

In 2023, we updated our Group Standard Operating Procedure (SOP) for assessing the performance of suppliers and production sites against Kingfisher's ethical requirements. This document is accompanied by Work Instructions, which outline the detailed steps and relevant guidance required to implement the SOP.

i Code of Conduct training

This year, we relaunched our Code of Conduct training. It now includes sections on anti-bribery and corruption, gifts and hospitality, conflicts of interest and a dedicated module on modern slavery. To date, the training has been completed by over 92% of Kingfisher employees globally and we will continue to roll it out as part of the ongoing compliance training.

Partnership and collaboration

To develop and implement our programmes, and tackle wider challenges for our sector, we work with human rights and modern slavery experts, industry organisations, trade unions, peer companies, government agencies, multistakeholder initiatives, audit platforms, sustainability assessment tools and NGOs, among others.



SLAVE-FREE
ALLIANCE

Working Towards a
Slave-free Supply Chain

i Slave-Free Alliance: A key partner on modern slavery

We have been working with Slave-Free Alliance (SFA), a social enterprise initiated by anti-slavery charity Hope for Justice, for several years. They have helped us develop our policies, train our teams and our suppliers, and strengthen our audit and due diligence approaches.

Human Rights and Modern Slavery Gap Analysis

SFA undertook a large-scale review of our approach to human rights and mitigating modern slavery risk. Although this had been done previously (pre-pandemic), the business and risks have since changed so it was considered important to repeat the exercise.

They conducted stakeholder interviews with key people across the business to understand our human rights and modern slavery approach, e.g. Human Resources (including Inclusion and Diversity), Responsible Business, Communications, Ethical Compliance teams, Community, banner logistics, Group Procurement, etc. SFA looked at our current ways of working and benchmarked against good practice to identify gaps and areas of risk.

During 2024, we will begin to integrate and action recommendations into our approach.

Goods not for resale (GNFR) risk matrix

In 2023, we worked with SFA to assess our GNFR supply chain and provide a practical risk rating for our categories of purchase, along with the level of influence we have within that category. This piece of work will be used to inform our programmes of work going forward.



Our key partners

We continue to work with partners to address human rights and modern slavery risks and participate in forums with the aim of improving standards across the retail sector.

Partner	About	How we're working together
Amfori BSCI	A platform for social-related supply chain information.	In addition to using the platform to monitor our site compliance, we have been working with their UK London connect group to discover additional elements of their platform that could benefit our programme, e.g. Country Risk and Self-Assessment Questionnaire (SAQ) development.
Better Retail, Better World	A retail sector collaboration led initiative by the British Retail Consortium (BRC) supporting the UN Sustainable Development Goals including on human rights and decent work.	We are working with the BRC utilising the Better Retail, Better World framework to address the UN Sustainable Development Goals.
British Retail Consortium (BRC) Ethical Working Group	A sharing forum for updates on the latest ethical labour developments in the supply chain, including human rights due diligence and modern slavery.	As a member of the working group, we collaborate with our industry peers and share best practice for human rights due diligence in the retail supply chain.
EcoVadis	An online assessment tool that provides sustainability ratings for our suppliers.	Used to assess our GNFR suppliers with whom we spend over £75,000.
Elevate	A supply chain consultancy specialising in responsible recruitment.	We have collaborated with this consultancy agent to develop project training materials and deliver online training to suppliers. Some suppliers have independently elected to utilise Elevate as a consultancy to help them address the issues found at their sites.
Sedex	A platform providing a service package to identify, manage and assess social and environmental supply chain data, which also owns the SMETA audit methodology.	We collaborate with Sedex to gain a better understanding of their latest requirements, how to integrate them into Kingfisher's ethical requirements, and assist our suppliers in meeting these requirements.
Slave-Free Alliance	A social enterprise non-profit set up by Hope for Justice that works with victims, law enforcement agencies and businesses to help bring about a slavery-free supply chain.	This year they delivered a modern slavery workshop; provided consultancy and guidance on a number of topics; worked with us on the gap analysis process; and worked with us on updating the risk assessment process for GNFR suppliers. They also provide feedback and guidance on our reporting.
Stronger2gether	A not-for-profit organisation that provides businesses with practical training, resources, business services and collaborative programmes.	We are sponsoring their Responsible Recruitment Toolkit to provide free training and support to suppliers and labour providers.
TUV Rhineland	An audit company conducting Environmental Health & Safety (EHS) audits for Kingfisher electroplating suppliers.	TUV designed special assessment kits and conducted assessments to verify the electroplating processes of a regional cohort of Kingfisher's direct – and indirect – suppliers for compliance with EHS laws and regulations.
United Nations Global Compact Child Labour Working Group	A United Nations Responsible Business pact covering human rights, labour standards, anti-corruption, and environment.	We report progress against the 10 principles of UNGC, one of which is human rights. We have worked with them on awareness-raising work with the Responsible Business network as part of Anti-Slavery Day. Kingfisher is also part of UNGC's child labour and modern slavery working groups.

Looking to the future

Our commitment to address modern slavery risks and uphold the human rights of every individual in our business and supply chain is an ongoing process. We will strive to keep improving our practices and reviewing our priorities.

In the immediate future, we will concentrate on:

Risk mitigation

- The output from the Slave-Free Alliance (SFA) Human Rights and Modern Slavery Gap Analysis and addressing those findings.
- Work to create an action plan, managed by the Human Rights and Modern Slavery Working Group, on which we will monitor progress.

Training

- Do more training – this time focusing on Group procurement, commercial teams and buyers, following the success of the modern slavery workshop.
- Continue to conduct workshops and training for ethical and sustainability leads.

Supply chain transparency

- Increase the transparency within our global supply chains for both GFR and GNFR.
- Expand the number of GNFR suppliers assessed by EcoVadis and work with our suppliers to increase their scores.
- Make progress on our target of 100% disclosure of production sites by OEB suppliers.
- Continue to support our banner Sustainability teams, in driving disclosure of production sites by non-OEB suppliers.

Addressing and reducing the risk of modern slavery

- Continue to raise awareness internally, working with the Responsible Business network and increasing internal communications.
- Extend the existing communications for Anti-Slavery Day to include teams not working directly with suppliers.

Beyond audit and supplier capacity building

- Extend our 'beyond audit' programmes including:
 - implementing our electroplating project;
 - gathering worker voice feedback in addition to ethical audits;
 - conducting supplier and production site training sessions to advise on country-specific issues to Turkey; and
 - working with top Screwfix suppliers to conduct a detailed review of their production sites and audit findings and being more proactive about closing any open audits.

Upcoming legislation

- The reporting landscape is evolving rapidly, and preparations are being undertaken to ensure we will be ready to meet the requirements of regulations like the Corporate Sustainability Due Diligence Directive. Our focus here is to understand the relevant scope and the due diligence processes required for our business.



Modern Slavery Act Transparency Statement approval

Entities covered by this statement

This statement covers Kingfisher plc and all its subsidiary undertakings. This includes the following UK subsidiaries with a turnover of £36 million or above:

- B&Q Limited
- Kingfisher International Products Limited
- Kingfisher Information Technology Services (UK) Limited
- Screwfix Direct Limited
- Screwfix Spares Limited

Approval process

This Transparency Statement was approved by the Board of Directors for each entity listed above/below. It is signed by the Kingfisher Chief Executive Officer who is also a member of the Board of Directors for Kingfisher plc.



Thierry Garnier, Chief Executive Officer
16 July 2024

Date signed off by Board of Directors

Kingfisher plc: 16 July 2024

B&Q Limited: 12 July 2024

Kingfisher International Products Limited: 12 July 2024

Kingfisher Information Technology Services (UK) Limited: 12 July 2024

Screwfix Direct Limited: 12 July 2024

Screwfix Spares Limited: 12 July 2024

Slave-Free Alliance has completed a review of Kingfisher's Modern Slavery Act Transparency Statement 2023/24. This included the structure and content of the Modern Slavery Statement and provided feedback in respect of compliance with current and proposed new UK legislative requirements and alignment with good practice. All observations and recommendations were fed back to Kingfisher as part of a separate report.

Kingfisher



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SCREWFIX

