



N O R C R O S

Group Human Rights Policy

April 2025

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1 Introduction and Policy

At Norcros we are dedicated to fostering an inclusive and ethical work environment that reflects our support for our employees in the moments that matter in work and in life. Guided by the principles of the UK Corporate Governance Code, we prioritise effective leadership, transparent operations, and meaningful engagement with all stakeholders. To that end, our policies are designed to ensure that our practices are progressive and promote a collaborative culture in which everything that we do is rooted in care, courage, connection and common sense, contributing to sustainable success for all.

As a market-leading designer and supplier of high-quality and sustainable bathroom and kitchen products in the UK, Europe and South Africa markets, Norcros plc ('Norcros') recognises its responsibility to uphold internationally recognised human rights in all aspects of its business operations wherever they may be based.

We are committed to respecting the principles contained within the United Nations Declaration of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and other core conventions; this policy describes how Norcros seeks to observe and implement such principles.

Norcros South Africa is a Broad-Based Black Economic Empowerment (B-BBEE) accredited organisation. We expect South African suppliers to be aware of their B-BBEE responsibilities and to be B-BBEE accredited, improving their B-BBEE performance and/or working towards B-BBEE accreditation.

Should it be found that Norcros has caused or contributed to human rights violations, we are committed to remedying the impacts to the best of our abilities.

This policy should be read and implemented in conjunction with guidance provided in Norcros' Code of Ethics and Standards of Business Conduct, as well as other company policies relating to specific areas of human rights, including our Modern Slavery Act Statement, which is updated and published annually. The latest version can be found on our website (www.norcros.com).

2 Employees

Norcros respects the human rights of its employees, as established in the ILO's Declaration on Fundamental Principles and Rights at Work, comprising non-discrimination, prohibition of child and enforced labour and freedom of association. Norcros' framework of employment policies and procedures covers its duties as an employer, and many promote specific human rights either directly or indirectly.

Where Norcros' role as an employer may associate it in any way with actual or perceived human rights violations of its own employees, these must be referred to Norcros' Chief People Officer in the first instance, or alternatively they can be reported via our independent, externally managed Whistle-blowing reporting line, noted in Section 5.

3 Suppliers

Norcros does not accept and has a zero-tolerance approach to the use of child labour or forced labour (i.e. Modern Slavery) of any kind anywhere in its own business or its supply chain. Norcros issues a public statement annually to this effect, which can be found on its website (www.norcros.com).

Norcros has a Group Supply Chain Policy, which includes a supplier due diligence process that aims to evaluate and select major suppliers based upon criteria including their compliance with human rights and ethical policies. Key supplier assessments include evaluation of policies and practices in this area.

Norcros expects its suppliers to adhere to Norcros' Code of Ethics and Business Standards, or to adhere to their own equivalent Code of Conduct. Key suppliers are expected to make a commitment to adhere to our Code of Ethics and Business Standards, or to provide us with a copy of their own Code of Conduct that meets at least an equivalent standard.

Where Norcros' role as a purchaser of goods or raw materials may associate it in any way with actual or perceived human rights violations, these must be referred to the Chief Legal Officer & Company Secretary in the first instance, or alternatively they can be reported via our independent, externally managed Whistle-blowing reporting line, noted in Section 5.

4 Business Partners

In certain markets, Norcross places reliance on third party retailers to sell its products.

As part of its onboarding and ongoing due diligence processes, Norcross evaluates and selects its major business partners based upon criteria that include their compliance with human rights and ethical policies.

Norcross expects its business partners to exhibit behaviour in line with Norcross' Code of Ethics and Standards of Business Conduct.

Where Norcross' role as a seller of goods and services, either directly or via third parties, may associate it in any way with actual or perceived human rights violations, these must be referred to the Chief Legal Officer & Company Secretary in the first instance, or alternatively they can be reported via our independent, externally managed Whistle-blowing reporting line, noted in Section 5.

5 Raising Concerns and Seeking Guidance

Employees and external parties are encouraged to raise concerns about any instance of malpractice, including abuse of human rights, at the earliest possible stage, either through internal grievance procedures, or, where deemed more appropriate, via Norcross' confidential, independently operated whistle-blowing reporting lines.

Please refer to the Group's Whistle-blowing Policy and Procedure for further information.

6 Monitoring and Review

The Board will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and conduct due diligence procedures across all operations to ensure the effectiveness of this policy statement, making improvements as appropriate. The Board will make an independent assessment of the adequacy of the policy and disclose any material non-compliance in the Annual Report to shareholders.

The Board of Directors
Norcross plc
April 2025