

Modern Slavery Statement

This statement applies to The Senator Group Ltd and the information included in this statement refers to the financial year 2025/2026.

Introduction

Our commitment to our customers is very clear - we will always treat people in our business and supply chain fairly, this includes being at the forefront of eradicating modern slavery.

Senator International Limited (The Senator Group) has zero tolerance to slavery and human trafficking in any part of our activities and our supply chain. We are committed to ensuring that we have appropriate policies and procedures in place to identify and prevent any such practices.

Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they were deceived or coerced into, and feel they cannot leave. Modern slavery is a serious and often hidden crime, and the impact can be devastating for the victims.

Modern slavery is an international crime that affects an estimated 29.8 million slaves around the world, with an estimated 13,000 people held in slavery in the UK today, however many victims are not identified or reported.

Modern slavery, human trafficking and forced labour are a growing concern around the world. Due to this, The Senator Group feel it is an integral part of our business ethics and corporate responsibility to ensure the human rights of all workers are respected across our business and supply chains.

The Senator Group is committed to acting ethically and with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of slavery and human trafficking taking place within the business and supply.

This statement is pursuant to section 54 of the Modern Slavery Act and sets out the steps that The Senator Group has taken to prevent acts of modern slavery and human trafficking within our business and supply chain. This statement has been reviewed and approved by our Board of Directors.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat.
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- being dehumanised, treated as a commodity, or bought or sold as property.
- being physically constrained or to have restriction placed on freedom of movement.

Our Business

The Senator Group comprises of the following separate and distinct entities (and wholly owned subsidiaries):

- Senator International Limited - 01323955
- Mytton Fold Hotel 2020 Ltd -12431013

The Senator Group is a family run, office furniture manufacturer headquartered in the UK, distributing to more than 100 countries globally, we employ over 1,300 people, predominantly within the UK, USA, India, and Europe.

Our Approach

The Senator Group has comprehensive policies and processes in place to ensure we are working in the most ethical manner. Ethical decision making is at the forefront of our business ethos, and working with our employees and supply chain is paramount to ensuring we achieve our goals in this area.

To support this, we have a modern slavery team who work together to ensure we are compliant with the law and to identify and mitigate any risk.



Complementing our ethical practices, The Senator Group have a robust Anti-Slavery and Human Trafficking Policy.

Due Diligence

The Senator Group carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in our business or supply chains, including conducting a review of the controls of our suppliers.

The Senator Group has, to our knowledge, not conducted any business with another organisation which has been found to have involved itself with any form of modern slavery, including child labour, forced labour or human trafficking.

In accordance with section 54 of the Modern Slavery Act 2015, The Senator Group has taken the following steps to ensure that modern slavery is not taking place:

- Reviewing our supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery.
- Measures are in place to identify and assess the potential risk in our supply chain.
- We will undertake impact assessments of our services upon potential instances of slavery being detected.
- We have created action plans to address the risk of modern slavery within our business and supply chain.
- We undertake any actions to embed a zero-tolerance policy towards modern slavery
- Comprehensive training provided to staff to ensure competency in this area.

Our workforce

The Senator Group takes its responsibility to raise awareness around modern slavery very seriously. We believe that to protect our workforce, that all employees need a basic understanding of what modern slavery is, the signs to look out for and how to report any concerns.

All staff members, no matter the role they will be undertaking, receive a company induction, which includes a presentation on modern slavery. This ensures that all staff members have received a basic introduction into what modern slavery is and who to report to should they have any concerns. Following this induction our staff members also receive a modern slavery leaflet, allowing them to refresh their knowledge if needed and also has contact numbers on should they feel they need to seek advice.

In addition to this we have weekly team briefs across the whole business, carried out by relevant supervisors/managers. This gives us an opportunity to share any updates to modern slavery legislation or guidance or sign post our staff to any events such as the World Day against Trafficking in Persons and the Anti-Slavery Day.

All key members of staff are signed up to our online training module for modern slavery – ensuring that staff in senior positions (such as managers and supervisors) have the competency and capability to support our workforce if they raise concerns (which could be about themselves or their colleagues).

Awareness - awareness of modern slavery through effective comms and employee events. Recently we carried out a Health and Well-being roadshow across all 4 of our Lancashire sites. Staff had access to a wealth of information from how to access our company health plan, to cancer awareness to mental health/wellbeing support. It also included a standalone stall on Modern Slavery, giving out information on the signs of modern slavery and how to report any concerns. Staff were able to take away a leaflet and were given contact details for further information/support if needed. This event reached approximately 1000 of our staff members, supporting our commitment to modern slavery awareness and commitment to ensuring modern slavery does not occur in our workplace.

The Senator Group commit to continuing to evolve and improve our training for both employees and our supply chain.

Recruitment and Employment

The Senator Group have a robust recruitment process in place, ensuring we comply with all relevant UK employment laws.

We have a dedicated HR team of 9 members who are responsible for our recruitment processes and the onboarding of new employees. We employ 1300+ workers. Within the recruitment/onboarding process every employee has their identification checked and is given a contract, in which our HR department and they must sign (both parties keep a copy). Each employee has an auditable record of payment, a centrally held personnel file and follows a strict HR process for logging overtime and absences. All employees are paid above the national minimum wage and have access to our HR team to support employment queries. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

Our recruitment processes are compliant with the following legislation:

- The Sex Discrimination Act 1975
- The Race Relations Act 1976, along with The Race Relations Act 1976 (Amendment) Regulations 2003
- The Disability Discrimination Act 1995
- The Employment Equality (Sexual Orientation) Regulations 2003
- The Employment Equality (Religion or Belief) Regulations 2003
- The Asylum and Immigration Act 1996
- The Rehabilitation of Offenders Act 1974 (Exemptions Order 1975 and Amendment orders 1986)
- The Data Protection Act 1998
- The Modern Slavery Act 2015

Offer Process

Successful candidates are made a verbal offer by telephone by either the Hiring Manager or Internal Recruitment team confirming salary, location and potential start date.

On acceptance, the HR team will draft an Offer Letter & Contract which is signed by the Line Manager and emailed to the New Hire within 48 hours.

New Hires will complete the relevant new starter paperwork (Next of kin details, tax code information, equal opportunities, rehabilitation of offenders act information, working time regulations) and return to HR for processing.

HR ensure all the returned paperwork is correct and then a Right to Work Check is completed. This process involves:

- Checking identification/documents from List A or List B as listed in Right to Work Checklist
- Following this we use the Home Office online to check the persons right to work details. We are able to do this as the individual will have provided their share code and date of birth.
- Retain evidence of the online check - we retain evidence of the online right to work check. For online checks, this is the 'profile' page confirming the individual's right to work. This is the page that includes the individual's photo and date on which the check was conducted.

We carry out Right to Work Checks in the presence of the holder and record the date on which the check was conducted.

All details are then passed onto Payroll and a new employee number is generated.

Right to Work Checks

The Senator Group conforms to the Modern Slavery Act 2015 and therefore we ensure all employees have the right to work in the UK.

At the time of registration, the identification and 'right to work' checks are conducted for each employee as above. This ensures that the worker has control of their own documentation and that their job expectations are managed effectively. All interviews are completed face-to-face with the individual to make sure that they have freely chosen to attend. In addition, throughout the registration and interview process, all application forms are checked and verified as being the applicant's own information. We also ask where they found out about The Senator Group and the role in which they have applied for, at all times monitoring this response, checking for any signs of modern slavery/human trafficking.

Policies and Controls

We have a robust Anti-Slavery and Human Trafficking Policy in place and our focus on slavery and human trafficking is very important to our business and we encourage transparency and accountability at all levels. We will not tolerate forced, bonded or indentured labour, involuntary prison labour, slavery, or trafficking in our business.

The Senator Group also have the following policies and processes in place which further define our stance on modern slavery:

- (Employee) Code of Conduct
- Human Rights Policy
- Recruitment Policy
- IMS Policy
- Whistleblowing Policy
- (Supplier) Code of Conduct
- Clear process for reporting concerns

Right to Work Check within our Supply Chain

Any supplier in which The Senator Group engage with is asked to sign our Code of Business Ethics and Conduct.

The purpose of this Code of Business Ethics and Conduct (Code) is to describe how The Senator Group conducts and expects its suppliers to conduct its business in an ethical and socially responsible way.

"Senator suppliers ("Suppliers") commit, in all of their activities, to operate in full compliance with all the laws, rules, and regulations of the countries in which they operate. This Code goes further, drawing upon internationally recognised standards, in order to advance social and environmental responsibility. The provisions of this Code constitute minimum and not maximum standards. It should not be used to prevent companies from exceeding these standards. Where the provisions of law and this code address the same subject, the provision which affords the greater protection should be applied."

The Senator Group is committed to ensuring that working conditions are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

The Senator Group requires that suppliers implement this code using management systems described within the document. TSG reserves the right to visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with this code and to audit supplier's wage structure, working hours, payroll processes, and other worker records and practices. Violations of this code may result in immediate termination as a Senator Group supplier and (where required) in legal action.

The Modern Slavery Act 2015 stipulates that employers must carry out right to work checks on all staff members. During the onboarding process for all our suppliers, they must fill out a supplier questionnaire. Within this we ask if the company conforms to the Modern Slavery Act 2015. Upon confirming this, we will be satisfied that the company complete right to work checks on their employees.

Supply chain

The Senator Group recognises that due to the nature of our business (manufacturing) and the suppliers we engage with, that we are exposed to a greater risk of modern slavery. To mitigate this risk, we have imposed the below steps.

All our key direct suppliers both new and existing must sign and return our Supplier Code of Business Ethics or have an equivalent policy that we deem acceptable.

Suppliers must uphold the human rights of workers, as specified in the International Bill of Human Rights, and treat them with dignity and respect as understood by the international community.

Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their labour use.

Our key direct suppliers will be expected to provide evidence of compliance with our Supplier Code of Business Ethics, which requires them to:

- Provide employees with good working conditions, fair treatment and pay rates that meet the minimum legal required standards; and
- Respect workers' human rights and comply fully with all applicable laws. We also require that:
- All work must be voluntary, and not done under any threat of penalties or sanctions.
- Workers must not pay any deposits for work and employers, or labour providers must not keep originals of identity documents.
- Involuntary labour is prohibited, and workers must be free to leave work at any time with outstanding monies to be paid to them.

The Senator Group is committed to ensuring that all our suppliers do not accept any form of exploitation. Suppliers shall not violate any international anti-slavery conventions, and applicable anti-slavery laws and regulations of the countries in which they operate and shall not traffic in persons or use any form of slave, forced, bonded, indentured, or prison labour. This includes the transportation, harbouring, recruitment, transfer, or receipt of any person(s) by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All work must be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers shall ensure that third-party agencies providing workers are compliant with the provisions of the code and the laws of the sending and receiving countries, whichever is more stringent in its protection of workers. Suppliers shall ensure that contracts for both direct and contract workers clearly convey the conditions of employment in a language understood by the worker. Where workers are required to pay a fee in connection with obtaining employment, Suppliers shall be responsible for payment of all fees and expenses in excess of the amount of one month of the worker's anticipated net wages. Such fees and expenses include, but are not limited to, expenses associated with recruitment, processing, or placement of both direct and contract workers. The Senator Group

reserves the right to request that suppliers demonstrate that they have policies and procedures in place to ensure that the potential for slavery and human trafficking is significantly reduced.

Child Labour avoidance: Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 15 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

This Code does not prohibit participation in legitimate workplace apprenticeship programs that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. Workers under the age of 18 shall not perform work that is likely to jeopardise the health or safety of young workers. Juveniles shall not be expected to work at night or carry out activities that are potentially hazardous or injurious to their health and development.

The Senator Group also commits to working with our supply chain to support their business in understanding how modern slavery may affect them and their own supply chains, as well as ensuring they carry out their own obligations in compliance with the Modern Slavery Act 2015.

Approach to Modern Slavery Risk Management

The Senator Group carries out the following steps to ensure risk management:

- **Internal Accountability:** Internal accountability standards, procedures and audits are used to help confirm that both employees and suppliers understand and meet the standards put in place by The Senator Group.
- **Assessment:** We identify and assess the risk of modern slavery within our own organization and supply chain through audits carried out by our ISO team.
- **Policies and Procedures:** We have a clear policy in place that clearly outlines The Senator Group's policy on modern slavery. This is also extended to our supply chain where they must sign our Code of Business Ethics and Conduct.
- **Due Diligence Audits:** Suppliers must be willing to be audited by our standards team on various elements outlined by The Senator Group, including Quality, Environmental, H&S, Modern Slavery, Human Trafficking, Child Labour, Forced Labour, Chain of Custody (where required) and any other area deemed a requirement of the business. We also cover due diligence through site visits and supplier questionnaires.
- **Training and Awareness:** All staff are given training on modern slavery during the induction process; all key members of staff undertake online training on modern slavery; awareness of modern slavery is communicated through effective comms and employee events.
- **Monitoring and Reporting:** We have a dedicated in-house ISO team who monitors compliance with our modern slavery policy which includes the audits aforementioned. We also have a clear reporting procedure in place supported by our HR department and Modern Slavery Lead.
- **Action:** We will take immediate action to address any instances of modern slavery identified. This may involve terminating contracts with our suppliers and implementing corrective measures to prevent future occurrences.
- **Continuous Improvement:** We review our modern slavery statement annually and will update our modern slavery risk management approach to ensure it remains effective in addressing evolving risks and challenges.

Our Commitment

The Senator Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Senator Group understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Senator Group does not enter business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to our business in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Senator Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation.

Continuous Improvement

The process of risk-based approach, review and improvement is a continual one for The Senator Group, and we will maintain this approach to ensure that our policies not only remain appropriate, but also help us identify and prevent any risk of modern slavery or human trafficking penetrating our business or our supply chain.

The Key areas of focus for The Senator Group are: -

- Extending our work on Modern Slavery within the whole breadth of our sourcing and operations with special emphasis on working with international suppliers.
- Up-skilling our stakeholders to ensure we are doing all in our power to eradicate Modern Slavery.
- Equality of all employees; gender equality; wage equality; and promotion of diversity
- Working together with our supply chain to carry out due diligence and ethical audits, to identify any areas of concern to mitigate risk.
- Focusing on further understanding our supply chains, including any potential risk. This will include labour providers and recruiters through to supply chain and services.



Robert Mustoe
Managing Director