



The Home of Homes:

Modern slavery and human trafficking statement

Dunelm Group plc
for the Financial Year to 27 June 2026

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Introduction

Dunelm is committed to acting ethically, with integrity and transparency in all our business dealings and to putting in place effective systems and controls to safeguard against modern slavery within our business and supply chain.

Modern slavery is often a hidden crime involving the severe exploitation of people for personal or commercial gain, through the use of threats, violence, coercion, deception or abuse of power. Dunelm strongly opposes the use of slave or trafficked labour and will never knowingly enter into a business relationship with any organisation involved in slavery, servitude or human trafficking.

By keeping modern slavery out of our supply chain and helping partners and colleagues to spot the signs, we create stronger, more resilient partnerships, workforces and communities.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 ('Act'). It covers the activities of Dunelm Group plc and the following companies which are subsidiary undertakings: Dunelm Limited, Dunelm (Soft Furnishings) Ltd, Dunelm Estates Limited, Zoncolan Limited, Fogarty Holdings Limited, Globe Online Limited and Dunelm (Soft Furnishings) Londonderry Limited (together 'Dunelm' or 'Group'). Although our subsidiaries in the Republic of Ireland fall outside the scope of the Act, relevant policies and controls are applied consistently across the business where appropriate.

We have prepared this statement with input from colleagues across the business, reflecting the cross-functional nature of our approach to identifying and managing modern slavery risk. It sets out the steps that Dunelm has taken and will continue to take to identify, prevent and mitigate the risk of modern slavery and human trafficking in its operations and supply chain.

In FY26 we continued to evolve our approach by enhancing supply chain transparency, increasing assurance over higher-risk areas and improving the way that emerging risks are identified, escalated and addressed. As our programme continues to mature, we remain focused on strengthening oversight, increasing due diligence and driving continuous improvement across our operations and supply chain.

Clo Moriarty
Chief Executive Officer

Approved by the Board
of Dunelm Group plc
on 3 September 2026

FY26 progress at a glance

Cotton mapping

Enhanced mapping process by introducing risk-based provenance testing.

➤ [See case study](#)
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Spot check programme

Further developed our spot check programme, with increased focus on Turkey and Pakistan.

➤ [Find out more about the programme](#)
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Supplier engagement

Included discussions on our expectations and approach in meetings with suppliers, responsible sourcing action plans and supplier conference to improve engagement.

➤ [Find out more about our supplier conference](#)
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Tier 2 audit data

Analysed and commenced work with suppliers to improve standards at Tier 2 sites.

➤ [See case study](#)
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Whistleblowing

Transitioned to a new service provider, SafeCall, who provide a 24/7 anonymous, multi-language reporting line to all workers, including those of our suppliers.

➤ [Find out more](#)
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Our business, supply chain and governance framework

Our business and supply chain

We are a specialist retailer of homewares and furniture, with a broad offer of quality products at a range of price points sold across our 204 stores and on dunelm.com.

Most of our stores are located in the UK, with 13 in the Republic of Ireland and one in Jersey, and the majority include a Pausa coffee shop. Our dunelm.com website offers home delivery to UK customers and collection from our stores.

We operate from the following other locations:

- a Store Support Centre (head office) in Leicester and a London satellite office;
- three warehouses in Stoke and one in Daventry and distribution centres in Stoke, Dartford, Bristol, Barnsley and Northampton;
- a curtain and blinds manufacturing centre and a mock shop in Leicester;
- a customer service centre in Radcliffe, Manchester;
- a home delivery operation (Dunelm Home Delivery Network); and
- a blinds and curtain pole and tracks manufacturing centre in Cannock.

Our business is supported by c.12,000 colleagues across the UK, Jersey and Ireland.

Governance and oversight

Modern slavery risk is a consideration for all of Dunelm's operations and activities, particularly in respect of the premises from which we operate, the supply chain for the products that we sell, and the services that we outsource. We have a clear governance and risk management framework (as illustrated on the right) to safeguard against any form of modern slavery taking place within the business or our supply chain, adopting a top-down, bottom-up approach.

Our modern slavery risk assessment is reviewed twice a year by the Modern Slavery Steering Group, which is chaired by the Group General Counsel and Company Secretary. The Steering Group reviews the controls in place for each identified risk and challenges the business to strengthen mitigation where control gaps are identified or residual risk remains elevated. The Steering Group also regularly discusses updates on emerging regulatory developments, stakeholder expectations and evolving best practice, liaising with business areas and other Executive-led committees (such as the Risk and Resilience Committee) as needed and ensuring that appropriate actions are agreed, implemented and monitored through to completion.

Modern slavery governance framework

Group Board/Audit and Risk Committee

Reports and KRIs relating to ethical sourcing are included in the papers presented to the Audit and Risk Committee. Any material matter is reported to the Group Board.

The Group Board approves the Modern Slavery Act statement annually.

Risk and Resilience Committee

Receives reports, approves and monitors KRIs alongside operational updates on the ethical audit programme and any concerns relating to modern slavery. Meets monthly.

Top-down review of risks

Bottom-up review of risks

Commercial Risk and Resilience Steering Group

Ethical supply chain risks are reviewed monthly at Commercial Risk and Resilience meetings, led by our Head of Product Quality and Sustainability and the Ethical Manager and attended by senior leadership in the Commercial Team.

Individual Risk Owners

All colleagues who are responsible for a supplier relationship have accountability for identifying, assessing and mitigating the risk of modern slavery within their respective business areas and to escalate incidents and concerns as appropriate.

Modern Slavery Steering Group

This group comprises the Group General Counsel and Company Secretary, the Head of Procurement, the Head of People Business Partnering, the Head of Product Quality and Sustainability and the Ethical Manager. It oversees our approach to modern slavery, meeting on at least a quarterly basis.

How we assess and manage modern slavery risk

Our modern slavery risk assessment was developed through a structured review of the Group's operations and supply chain, drawing on existing operational risk registers, ethical audit programme data, supplier due diligence and input from subject matter experts.

It helps us identify, assess and prioritise the areas of highest risk across our operations and supply chain, so that we can focus our activities on where it is most needed.

Each risk is assessed by reference to likelihood and impact, both before and after controls, with mitigating actions, owners and review dates recorded to support ongoing monitoring and accountability. This enables us to focus our activity on the areas of greatest inherent and residual risk, including lower-tier supply chain transparency, sourcing from higher-risk countries, cotton provenance, homeworking, agency labour, colleague awareness and governance oversight.

We consider modern slavery to be more likely in roles that are low-skilled, require minimal communication, involve limited interaction with other groups, and are offered on a temporary or flexible basis.

We do not manufacture any of our own products apart from our made to measure curtains, blinds, tracks, curtain poles and shutters.

We source most of our goods for resale from suppliers based in the UK, although these suppliers typically source from overseas manufacturers, particularly in the Far East.

Food products in our coffee shops are manufactured in the UK but with ingredients sourced worldwide.

We partner with third-party providers for stock distribution, including deliveries to stores and customers. We also outsource various service activities such as certain IT services, store refit work, maintenance and cleaning.

Risk assessment process



Our policies and standards

We abide by, and require our suppliers to commit to, clear and effective policies that underline our commitment to acting ethically and with integrity, including in relation to reducing the risk of modern slavery within our business and supply chain. Our policies set out the standards and behaviours expected of our colleagues, suppliers and business partners. These include the following:

Ethical Code of Conduct for Suppliers and Partners

We require our suppliers to provide safe and legal working conditions for the people who work for them, and do not accept any form of exploitation. Our Ethical Code of Conduct for Suppliers and Partners requires them to follow a set of good labour practices based on the Ethical Trading Initiative (ETI) base code to drive improvements in working conditions throughout the supply chain.

Standard terms and conditions for non-stock suppliers

Non-stock suppliers and service providers are expected to provide a clear understanding to us of how they address modern slavery risks within their own businesses (as appropriate). We also seek to include a modern slavery clause in any contract that we enter, and such a clause is included in our standard terms and conditions.

Homeworker policy

Launched in FY25, we acknowledge that improving labour conditions for homeworkers is a complex issue. Under this policy, we expect our suppliers to adopt a shared acceptance of homeworking and commitment to improving homeworkers' labour conditions, working to identify where homeworking occurs in the

supply chain beneath them and developing action plans for improving conditions for homeworkers.

Whistleblowing policy

The aim of our whistleblowing policy is to provide a safe, confidential, and accessible way for colleagues and other workers in our supply chain to report concerns. Whether it is a breach of our ethical policies, human rights abuses, or any other issue that is or may be unlawful, we encourage individuals to speak up. All our Dunelm sites, together with our Tier 1 factories (who have different language versions) are expected to display posters with details of how to contact the whistleblowing hotline. Each reported incident is investigated in accordance with a procedure that has been approved by our Audit and Risk Committee. Updates are provided to the Risk and Resilience Committee and the Audit and Risk Committee.

Responsible cotton policy

All suppliers of Dunelm own-brand cotton products are required to abide by this policy, which includes ensuring that cotton products are not being sourced from banned or high-risk regions (e.g. Xinjiang, China) where there are higher risks of slave labour or human rights violations. We have mapped our UK cotton supply chain since FY23 to verify this requirement. In FY26, we introduced provenance testing on our cotton routes to strengthen further our due diligence in this area – see case study on page 7. To meet our 'more responsibly sourced' standards, suppliers must, in addition, support or source from an industry-recognised cotton programme that promotes lower-impact and ethically sound cotton sourcing (e.g. Better Cotton, recycled and organic cotton).

Compliance with these policies is monitored through our supplier onboarding processes, ethical audit programme, spot checks, whistleblowing arrangements and non-conformance process.

Where concerns are identified, we seek to ensure they are investigated promptly and addressed through appropriate corrective action, escalation, supplier engagement or, where necessary, responsible disengagement. Our focus is on ensuring that issues are remediated responsibly and that lessons learned are reflected in future risk assessment and monitoring activity.

Colleague Code of Conduct

During FY26, we refreshed our Colleague Code of Conduct, which sets out the standards of behaviour expected of all colleagues. The Code reinforces our commitment to acting with integrity and making decisions with positive intent, helping to create a safe, fair and respectful workplace. It highlights behaviours we expect from colleagues, including actively preventing modern slavery and raising concerns through our whistleblowing arrangements where something does not feel right. All colleagues are expected to understand and follow the Code, and breaches are treated seriously.



Our approach to due diligence

Dunelm own-brand products

The most significant supply chain and factory base for our business relates to Dunelm own-brand products. We consider all products sold under our own brands as 'high risk' because most of them are manufactured in countries which have a higher prevalence of modern slavery according to the 2023 Global Slavery Index, produced by Walk Free. In total we source from c.299 suppliers with 794 Tier 1 manufacturing sites in 22 countries.

Effective management of human rights risks within our supply chain is built into our stock procurement procedures, both in relation to the onboarding of new suppliers and ongoing monitoring by means of our ethical audit programme.

We manage our ethical programme and compliance with our Ethical Code of Conduct (and other relevant policies) internally by way of a dedicated team, which has extensive experience working with factories to assess and improve their practices regarding human rights issues. The team is supported by Verisio, a specialist audit services provider. In addition, monitoring and working to improve conditions is part of the factory management role carried out by our overseas sourcing partners. We also actively encourage our suppliers to further develop their own internal risk management processes.

Third-party branded products

Products manufactured by third-party brands (non-Dunelm) are also sold in our stores and online. These products are not designed, produced, stored or labelled as or by Dunelm. Third-party branded stock suppliers are generally assessed as 'medium risk', because we choose our partners carefully and require that, as the brand owner, they conduct their own checks and provide appropriate confirmations to us, as referenced below. We assess suppliers of food and drink products as generally 'medium risk' because we source from a small number of large UK or EU-based suppliers who are required to confirm to us that they operate controls and checks in relation to their supply chain.

Suppliers of third-party branded products are required to accept our Ethical Code of Conduct (and commit to other relevant policies, as applicable) and undertake an assessment where they need to demonstrate that they understand and comply with all legal obligations relating to product quality, responsible sourcing, safety, compliance and ethical trading. This assessment is graded, and a satisfactory standard must be achieved.

Non-stock and services used by Dunelm

We have a dedicated non-stock procurement function that engages with all suppliers and service providers with whom Dunelm has a contractual relationship, but who do not supply us with goods for resale. They consider the risk of modern slavery on a case-by-case basis depending on the sector, partner and nature of services being provided.

Our biggest risk within non-stock is the use of agency workers at our warehouses and distribution centres and drivers within the Dunelm Home Delivery Network, as we do not have direct control over the recruitment process. We regularly review our approach to using agency workers.

Other services, which we generally consider 'medium risk', are carriers, store refit and maintenance providers, cleaning and security. The majority of our partners in these areas are large companies, which operate in the UK. Other non-stock products and services provided to us are generally determined to be 'low risk'.

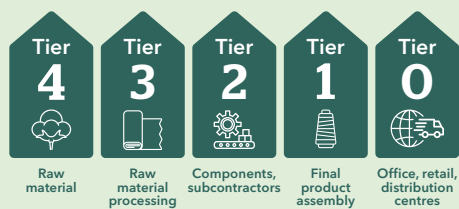
We seek commitment from all such partners that they will comply with our Ethical Code of Conduct (and other relevant policies, as applicable) or provide us with an equivalent commitment. As a result of risk assessment work conducted on our non-stock supply chain in FY24, we have increased our requirements for further information and comfort in areas that we have identified as medium to high risk.



Risk mitigation for Dunelm own-brand product supply chain

We consider assurance of high ethical standards – in particular, human rights – to be the foundation of any commercial supplier relationship. Knowing where, how and by whom our products are made is a key part of ensuring that our quality, ethical and environmental standards can be monitored and continuously improved.

Supply chain tiers



Ethical audit programme

We have implemented controls to identify and eradicate modern slavery and any other form of exploitation such as excessive working hours, child labour and poor safety standards, through our requirement for compliance with our Ethical Code of Conduct and our ethical audit programme. The programme currently covers all Tier 1 own-brand suppliers, all warehouses that hold stock of own-brand product and selected Tier 2 sites. We use an independent, expert third-party auditor, Verisio, to assess, grade and monitor the performance of our suppliers against our Ethical Code of Conduct utilising audit grading methodology.

Verisio also work closely with us to provide root cause analysis of issues and drive improvements in standards. All Dunelm Tier 1 stock suppliers must provide, on an ongoing basis, a third-party ethical audit report that is less than two years old (from an APSCA registered auditor and conducted on a semi-announced basis within a minimum three-week window) and a valid building and fire safety report in respect of each site. Failure to provide an audit that meets these requirements (within a grace period) is considered a breach of our policy. The audits are benchmarked and graded. All new sites must be graded low or medium-low risk before being used in connection with our products.

As part of the ethical audit programme, we also undertake unannounced spot checks. This provides additional assurance that standards are being maintained during the two-year audit cycle. Spot checks are undertaken on a risk-based approach and are focused on verifying standards of compliance and ensuring that products are made at declared and approved sites.

If concerns are identified from an audit or spot check, the supplier is required to address them under a corrective action plan, and the relevant site will be subject to more frequent reviews or audits, as appropriate, until the actions have been completed and sufficient assurance is given that the identified issues have been addressed. We may pause new product development during this time. We facilitate remote follow-up audits and assist suppliers in booking their own spot checks to accelerate the closure of non-compliance actions. Where the issues amount to a policy breach, we apply financial penalties and review the business relationship.

Case study: Strengthening cotton due diligence through provenance testing



In FY26 we took an important step in strengthening our due diligence on cotton sourcing by introducing provenance testing, building on the commitments set out in our Responsible Cotton Policy.

This policy requires all suppliers of Dunelm own-brand cotton products to ensure that cotton is not sourced from banned or high risk regions, such as Xinjiang, China, where the risks of forced labour and human rights violations are significantly elevated. Since FY23, we have mapped our UK cotton supply chain to verify compliance with this requirement. In FY26, we expanded this work by testing the origins of selected cotton routes.

Working with Eurofins, an independent specialist in fibre origin analysis, we carried out 14 provenance tests across a range of cotton supply chains. These were selected based on a mix of regions, suppliers and business value to provide a representative

view of potential risk. The results showed that all tested cotton origins aligned with the country of origin information provided through our cotton mapping documentation. This outcome provides additional assurance that the cotton used in these routes is consistent with our sourcing expectations.

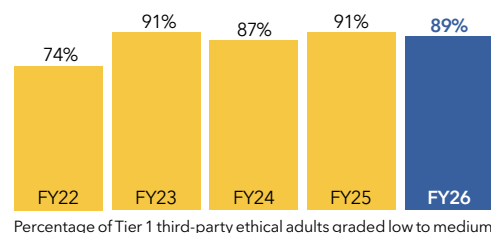
As we look ahead to FY27, we will continue to refine our approach to cotton due diligence. The introduction of traceable Better Cotton by some suppliers may reduce the need for full supply chain mapping in certain routes, and we will assess how this can be integrated into our broader risk management framework. At the same time, we are exploring opportunities to improve our provenance testing programme further to ensure that independent verification remains a core part of our assurance model. These developments will help us maintain a proportionate, risk-based approach while continuing to strengthen oversight of cotton origin across our supply chain.

Risk management of Dunelm own-brand product supply chain continued

We endeavour to work with suppliers in a responsible way to resolve issues before we stop placing orders, recognising that working conditions are not improved as a result of undertaking audits, but from changes to procedures, training and monitoring. However, we are not prepared to compromise supply chain integrity and so, if appropriate and timely action is not taken to address non-compliance (or if the findings are sufficiently serious), we will formally implement our responsible disengagement strategy and terminate the relationship.



In FY26, 99% (FY25: 99%) of our Tier 1 supply base had an in-date third-party ethical audit against a target of 100%. Since FY22 we have seen an increase in the percentage of such audits that are graded low to medium risk, with there being a slight drop in FY24, as shown in the chart below. At the end of FY26, the % of low-medium risk audits was at 89% vs a target of 90%. This was primarily due to an increase in spot check findings relating to inconsistent records, which generally take at least three months to be resolved to our satisfaction.



Developing the programme

We continue to seek greater transparency in our Dunelm own-brand supply chain. We are also committed to driving continuous improvement both within our own programme and from our suppliers. Some of our ongoing initiatives are described in the case study on the right.

Case study: Advancing Tier 2 due diligence and addressing emerging risks

Over the past year we have continued to strengthen our understanding of labour rights risks within our Tier 2 supply chain.

Building on the declaration and mapping exercise completed in FY25, which captured Tier 2 site information from 94% of our Tier 1 suppliers, we have used this increased visibility to drive more structured due diligence activity. With more than 2,400 Tier 2 sites across packaging, labelling, componentry and processing, this remains a complex undertaking, but the foundations laid in previous years have enabled meaningful progress.

In FY26, we focused on implementing the requirement for all in scope Tier 2 branded label and packaging suppliers and processors to undergo a semi-announced audit. By the end of the year, 418 sites in scope (29%) had submitted an audit report. This represents a notable step forward in building a clearer picture of working conditions deeper in the supply chain. Our aim remains to reach 100% audit completion and we continue to make good progress alongside our suppliers. At the point of publishing this statement, 498 of in scope sites (35%) had submitted an audit.

The audits received to date have provided valuable insight into the risk profile of Tier 2 operations and identified non-conformances that require remediation. Given the nature of Tier 2 manufacturing and the limited historic oversight in this part of the supply chain, this was anticipated and reinforces the importance of the programme.

As we enter FY27, we are beginning targeted work to address some of the higher priority issues identified through these audits, using the data to prioritise where intervention and support are most required. This includes engaging directly with suppliers on corrective action planning, strengthening expectations around responsible recruitment and working hours, and identifying where additional capability building or closer monitoring is required. Our plans and ongoing expectations for further progress in FY27 were communicated to all suppliers at our June 2026 supplier conference.

This programme is steadily improving our ability to identify and mitigate modern slavery risks beyond Tier 1. While there is still significant work ahead, the progress made in FY26 – from increased audit coverage to clearer risk segmentation – has created a stronger platform for enabling transparency, driving improvement and supporting suppliers to meet the standards expected across our wider supply chain.

Training and effectiveness

Internal training and awareness

Effective training is an important component of our approach to raising awareness and mitigating risk. We have created bespoke, modern slavery training modules that are completed on a mandatory basis annually by senior management across all functions and all colleagues working in our commercial, legal, people and procurement teams. This training provides insights into modern slavery, what it is, how it can occur and its potential impact on the Group, ways to identify warning signs, and the procedures for reporting concerns if any colleague suspects that it is happening at any of our stores, sites, or within our supply chain.

Training completion and pass rates are tracked and reported internally. Training module content is reviewed annually by our Ethical Manager and refreshed as appropriate to ensure it remains up-to-date, engaging and resonates with colleagues.

We often include partners operating at or from our Stoke distribution centres in training sessions. We also provide access to useful toolkits and training courses to help our partners and suppliers, as appropriate, build their knowledge and understanding, with a view to driving continuous improvement in their own assessment and management of human trafficking and modern slavery risks.

We direct any colleague or worker who suspects that modern slavery is occurring to contact our whistleblowing hotline. The service is an important tool in supporting our commitment to increasing transparency and safeguarding our employees and workers in our supply chain.

Supplier training and engagement

We continue to raise awareness of the importance of anti-slavery and ethical practices with our suppliers. In July 2026, following the year end, we held our annual ethical webinar. All suppliers were invited to attend, and the key focus areas were the importance of supply chain transparency and Tier 2 ethical due diligence requirements. We communicated with suppliers our ongoing aim for all branded label and packaging suppliers and processors to have a semi-announced audit in place and our plans for Tier 2 for FY27 (see case study on page 8). We also took the opportunity to communicate details of our new whistleblowing service provider and our expectations in ensuring that posters are appropriately displayed at all sites.

In June 2026, we held our supplier conference with some of our largest key suppliers. This is an opportunity to work through responsible sourcing action plans with our key suppliers in detail. We also incorporated several round table sessions on key workstreams such as Tier 2 due diligence enabling suppliers to discuss challenges, have an open dialogue and share learnings and opportunities.

We also support our suppliers by giving access to shared resources and knowledge, such as factory standards guidance, key checklists from recent audits and direct engagement with our internal specialist team and Verisio (our external audit provider).

Our engagement extends to all workers within our supply chain. Direct worker engagement forms part of our audit and spot check approach, helping us understand whether policies and standards are understood in practice and whether workers have access to safe routes to raise concerns.

Measuring effectiveness

Effectiveness is measured, reported and reviewed at a number of different forums, with escalation between them as appropriate (see page 3 for our governance framework).

Key risk indicators (KRIs) are considered by the Risk and Resilience Committee and are used to monitor the effectiveness of our approach to managing modern slavery and other ethical risks and identify areas requiring additional focus.

The KRIs are mapped to the principal risks and reviewed at each meeting. They include measures such as percentage of Tier 1 factories graded high risk and the number of suppliers falling below a certain threshold on the ethical scorecard. Each quarter, the Risk and Resilience Committee also receives updates on the ethical audit programme, spot check outcomes, supply chain transparency, whistleblowing incidents, colleague training and the delivery of agreed remediation actions.

Relevant updates and emerging themes are escalated through the Group's governance framework and reported to the Audit and Risk Committee where appropriate.

Supporting this oversight, the Commercial Risk and Resilience Steering Group meets monthly to review the operational details underpinning the KRIs. Product, supplier or process risks are assessed, with actions, accountability and timescales agreed to support timely resolution and ongoing monitoring.

Supplier ethical scorecards are issued each quarter to all suppliers and provide details of factory audit gradings, spot check outcomes, audit expiry and progress on Tier 2. Suppliers that fall below the required standards may be subject to additional monitoring and engagement until improvements are made.



Our roadmap

Addressing modern slavery requires ongoing vigilance and continuous improvement. As our business, supply chains and external environment evolve, so too does our approach to identifying, assessing and mitigating modern slavery risks.

Over recent years, we have focused on establishing a strong governance framework, implementing robust supplier standards, developing our ethical audit programme and strengthening our ability to identify risk within our operations and supply chain.

Building on the progress made to date, we have identified the following areas of focus to further strengthen our approach over the short, medium and longer term.

FY27 focus areas: expand visibility and controls

- Expand our Tier 2 audit programme and use findings to drive targeted supplier engagement and remediation activities.
- Build on our cotton due diligence programme by exploring options to improve provenance testing.
- Review opportunities to collaborate on initiatives focused on tackling modern slavery.
- Assess the development of a Group Human Rights Policy to support our approach to modern slavery and broader human rights risks.



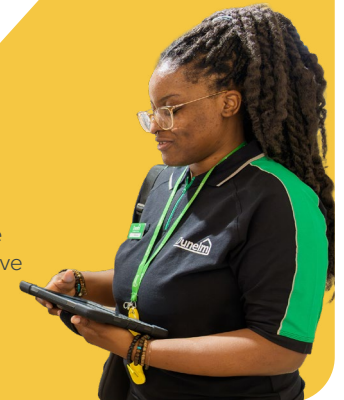
Medium term ambitions: build opportunities for external collaboration and embed human rights due diligence

Building on the foundations established to date, we aim to create greater opportunities for external collaboration, deepen our human rights due diligence across the supply chain, enhance remediation processes, and further embed human rights considerations within our sourcing and supplier management practices.



Longer term ambitions: drive sustainable improvements and further strengthen effectiveness

Our ambition is to contribute to lasting improvements within our areas of influence through collaboration, insight and continuous improvement, while further strengthening the positive impact and effectiveness of the actions we take.





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