



POLICY STATEMENT

**Human Rights & Modern
Day Slavery Policy**

1. Human Rights

We are committed to upholding the human rights of all those who work with us and for us and comply with international conventions regarding human rights and enforced or child labour.

1.1. What it means

Basic human rights, as defined by the United Nations Universal Declaration of Human Rights, include the right to life, liberty and security; equal rights of men and women; the right to protection under the law from discrimination, slavery, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion.

1.2. We always

- Create safe working environments for all.
- Uphold the principles defined by the United Nations Universal Declaration of Human Rights.
- Follow the labour laws of the countries in which we operate and protect the rights of all workers, including migrant workers.
- Comply with minimum wage and minimum age requirements.
- Adhere to regulations regarding maximum working hours.
- Listen when legitimate concerns are raised, and whenever possible take appropriate action to address them.
- Encourage employees to become involved in improving team performance.
- Ensure adequate welfare facilities are available.

1.3. We never

- Exploit anyone.
- Allow anyone to be exploited in our name.
- Do business with any individual, or organisation that does not support basic human rights or adhere to our own Global Code of Conduct/standards for our employees. This includes our Joint Venture partners, particularly where we are the Joint Venture operator or hold a majority interest.
- Influence an employee's decision to join or not to join a trade union.

2. Modern day slavery

We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place with our suppliers, third party key stake holders and Member companies.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

2.1. Our policy on slavery and human trafficking

Our anti-slavery policy reflects our aim to act transparently, respectfully and with integrity in all our business relationships. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place in our Member Companies, key stake holders or within our supply chain. We implement and enforce effective systems and controls to mitigate this risk.

2.2. Our supply chains

We have reviewed our purchases to understand the nature of our suppliers. These include freelancers, consultants and companies providing a wide range of goods and services to help us deliver our aims and objectives.

2.3. Risk assessment and due diligence process for slavery & human trafficking

We have in place systems to mitigate the risk of slavery and human trafficking occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. We assess the risk of slavery and/or human trafficking occurring in our supply chains and apply enhanced checks where higher-risk areas are identified.

2.4. Existing supply chain

As part of our risk management process, we carried out a risk assessment to consider any existing or future arrangements with third parties. This included identification of;

- all agencies we use to provide staff or services, where there is a heightened risk of poor practice, particularly where they employ non-UK nationals or in light of the services the staff are asked to provide;
- suppliers whose work involves a high level of physical labour; and
- relationships involving suppliers operating outside the UK, in countries where controls on employment practices may be weaker.

We identified risk areas so that we could review those relationships in more detail. This is an ongoing exercise.

2.5. Future suppliers

We will carry out risk assessments for new suppliers to consider the likelihood of maltreatment of staff or other unsatisfactory factors. This may mean that we decide not to work with them or seek further information, or assurances, before proceeding. For new suppliers where a higher risk is identified:

- If the supplier is required to comply with the Modern Slavery Act 2015, we will review their own published policies on modern slavery.
- For other suppliers, we will seek declarations that they meet appropriate requirements and may ask them to give information on their working practices.
- We will apply appropriate vetting procedures, based on the level of risk identified, to ensure we are comfortable that any risks involving slavery can be identified and addressed promptly.

2.6. Supplier adherence to our policy

To ensure all those in our supply chain including contractors comply with our policy, we have in place a compliance programme. This consists of undertaking pre checks with our suppliers and Members to ensure that they have a Modern Slavery Policy in place and if required undertaking Site Visits. Regular audits to check compliance with our policies and procedures. Representatives from our Finance Department and Quality Department support and uphold the programme.

2.7. Raising awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide updates to our staff via our intranet/staff briefings and by providing both written and oral reminders of good practice.

A handwritten signature in black ink, appearing to be "Mike Ward".

Signature:

Name: Mike Ward

Position: Managing Director

Date: 15/01/2026