

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This policy sets out the Company's aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

The company has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

The company acknowledges the provisions of the Modern Slavery Act 2015 and will ensure transparency within its organisation and with suppliers of goods and services to the organisation, the company is satisfied from its own due diligence there is no evidence of any act of modern-day slavery or human trafficking within its own organisation.

In respecting the dignity and rights of all employees the company applies the prohibitions, checks and permissions below to its operations. Specifically, it:

- ensures worker identity or immigration documents are verified in line with applicable legislation, prohibiting the retention or withholding of original identity or immigration documents, including passports, visas, biometric residence permits, and travel documents, which are either verified virtually or immediately returned to the worker if verified in person, with copies of such documents only being retained by authorised personnel for specific purposes and time;
- prohibits the use of recruiters or labour brokers, including child labour, who do not comply with the local labour laws of the country in which recruiting occurs, such that during due diligence recruiter reviews, recruiter agencies' compliance with labour laws and the highest standards of ethical conduct is verified and if any law is broken, the relationship with the offending agency will either not commence or will be terminated;

- ensures that prior to local hiring or relocation workers are provided with detailed, clear, and accurate written contracts of employment or similar work papers in a language understood by them in order to ensure that they understand all details related to their employment, comprehensively setting out both parties' rights, responsibilities, and obligations with regard to, *inter alia*, payment of wages, working hours, valid grounds for termination, and other issues related to the prevention of forced labour; and
- guarantees all workers, including migrant and local workers and employees, all of whom are employed by their own will, the right to cancel their contracts of employment or similar work contracts at any time and for any or no reason with no financial penalty in connection with this, subject to reasonable notice periods in accordance with local labour laws or collective agreement.

As part of the company's due diligence processes into modern slavery and human trafficking, the supplier approval process incorporates a review of the controls undertaken by the supplier.

Imported goods from sources outside the UK and EU are potentially more at risk of slavery and human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not knowingly support or deal with a business (contractors, suppliers or business partners) involved in modern slavery or human trafficking. We expect our suppliers to hold their own suppliers to the same high standards.

The ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Following its initial adoption, this policy will be reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.

Signed



**Steve Smith, Chief Financial Officer**

**10 April 2025**