

Modern Slavery and Human Trafficking

Our policy on Modern Slavery and Human Trafficking is committed to upholding international human rights and to acting with integrity in all its dealings, relationships, and supply chain interactions. We prohibit any form of forced labour and have a zero-tolerance approach to slavery and human trafficking. To ensure clarity on the ethical standards we require from every employee and supplier, there are key policies which set out the requirements within the Company and with those who we seek to do business with, including:

- Environmental, Health & Safety Policy
- Sustainability Policy
- Equality, Diversity and Inclusion Policy
- Anti-Bribery and Corruption Policy
- Whistle Blower Policy

In addition to the above and as part of our compliance with the policies referenced, we take the following steps:

- Facilitate, without fear of recrimination, our staff to report any concerns in relation to slavery and human trafficking within the Company's operations or supply chain. The Company's Quality Director, the Company EHS (Environmental Health & Safety) Manager and HR (Human Resources) Manager present an update on key policy developments, business site risk and compliance reviews, performance of suppliers and current focus areas on an annual basis to the Board of Directors.
- Training for staff ensures the Company's commitment to combat slavery and human trafficking by upskilling staff where appropriate. Our policies are available through our Company Intranet portal to all employees and updated as required for any relevant changes as and when required.
- All employees receive a written Contract of Employment in accordance with current legislation detailing all terms and conditions of their employment and if required, this contract will be translated to their native mother tongue language.

Due Diligence for Slavery and Human Trafficking

We will conduct due diligence when considering taking on new suppliers, and regularly review our existing suppliers. The Company's due diligence process includes checking that our supply-chain partners have the required Modern Slavery & Illegal Workers Policy in place so that we can also have some form of assurance that they are also conducting the required check.

Right to Work Policy

The prevention of illegal migrant working in the UK is governed by the Immigration, Asylum & Nationality Act 2006. In line with our governance obligations and sustainability efforts, we have developed this Policy to support the fair employment of migrant workers and the prevention of illegal working in accordance with the above-mentioned legislation.

When employing staff we will ensure the appropriate VISA, Passport and DOB checks are carried out to ensure new employees are entitled to work in the UK in accordance with the Immigration, Asylum & Nationality Act 2006. Should a potential employees' right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment. All related verified documentation will be retained for a minimum of 2 years after the individual has ceased employment with us.

This policy applies equally to all employees of the company including agency workers who may be recruited by the organisation. The company has a responsibility to ensure fair treatment processes are adhered to in line with current recruitment procedures and legislation.

The Company recognises and accepts its responsibilities towards migrant workers and will ensure that the following guidelines are observed:

- Ensure overseas workers have the necessary knowledge and skills to complete the work for which they have been employed, competently and safely.
- Ensure workers understand that the employer and employment agency/business or other labour provider have responsibilities for their health and safety.
- Carry out a risk assessment of the tasks the worker will be expected to undertake.
- Ensure the control measures identified in the assessment are effective, are in place and are maintained.
- Pass relevant information on workers' rights to the employee.
- Review basic competencies for the specific role and provide support as required. e.g. literacy, numeracy, physical attributes, general health, relevant work experience etc.
- Check whether professional qualifications are compatible with those in the UK.
- Provide essential induction training and any necessary job-related/professional training.
- Provide relevant information about the risks to which they may be exposed and the precautions they will need to take to avoid those risks.
- Consider the needs of workers who may not speak English well, if at all, and whether translation services are needed.
- Make sure workers have received and understood the information, instruction and training they need to work safely and consider how to ensure it is acted upon.

- Ensure workers are adequately supervised and can communicate with their respective supervisors.

This policy will be reviewed periodically by our Board to ensure its continued relevance to current and planned operations, or legal developments and legislative obligations.

Signed:

A handwritten signature in black ink, followed by the date "1/1/26" written in a similar cursive style.

Jimmy Byrne

Managing Director