Anti-Slavery & Human Trafficking Policy

Modern slavery (including forced labour & human-trafficking) is a criminal offence under the Modern Slavery Act 2015 (the "Act") and can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Across our global operations, we have a zero-tolerance approach to modern slavery. We are committed to the highest standards of ethics and business conduct in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere within our own businesses or those of our suppliers.

Our Approach

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We communicate our zero-tolerance approach to our suppliers and expect them to hold their own suppliers to the same high standards.

All our team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no-one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge

supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

Conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;

Engage with our suppliers both to convey to them our 'Modern Slavery' Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;

Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Our Leaders

Our leaders take responsibility for the prevention of modern slavery, by ensuring this policy statement and its' implementation comply with our legal and ethical obligations. Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

We are committed to continuing to address and minimise the risk of modern slavery within our business and supply chain we will not knowingly support or do business with any organisation that is involved in such practices.



Richard Butterfield

Group Chairman

March 2026