

Modern Slavery and Human Trafficking Policy

Version: 4

Approved: SMT and Managing Director

Effective date: May 2026

Next review: May 2027

1. Policy Statement

Euroclad Group Ltd ("the Company") mission is to accelerate a net zero emissions future with the wellbeing of people and planet at its heart. Euroclad recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Euroclad is absolutely committed to ensuring that there is no slavery or human trafficking in any part of our business, and to imposing the same high standards on our suppliers. Our people are expected to always act ethically and with integrity, and to raise concerns about our supply chain should any issues arise. Our management are expected to act resolutely to ensure compliance with this policy.

We have zero tolerance for modern slavery and are committed to acting ethically, transparently, and with integrity in all business relationships. This policy supports compliance with Section 54 of the Modern Slavery Act 2015 and underpins the Company's annual Modern Slavery and Human Trafficking Statement.

2. Scope

This policy applies to:

- All employees, directors, officers, and agency workers
- Contractors, consultants, and temporary workers
- Suppliers, subcontractors, service providers, and business partners

The policy covers:

- The Company's own operations
- All tiers of the Company's supply chains, both UK and international

3. Governance and Accountability

Overall responsibility for preventing modern slavery rests with senior leadership.

- The Managing Director has ultimate accountability for this policy.
- Day-to-day responsibility for implementation sits with HR, Procurement, and Operational Management.
- This policy is reviewed annually and approved at senior leadership level.

4. Risk Assessment

The Company recognises that modern slavery risks vary by:

- Geography
- Industry sector
- Labour intensity
- Use of agency, temporary, or migrant labour

We take a risk-based approach to identifying and assessing potential modern slavery risks within our operations and supply chains and prioritise high-risk areas for further scrutiny.

5. Due Diligence in Our Supply Chains

To mitigate risk, the Company will:

- Conduct risk-based supplier assessments during onboarding and renewal
- Communicate clear expectations regarding ethical labour practices
- Include appropriate modern slavery clauses in supplier contracts where reasonable
- Engage with suppliers to address concerns rather than adopting a “cut-and-run” approach, unless necessary

Where risks are identified, the Company will work to implement appropriate and proportionate remedial actions.

6. Effectiveness and Monitoring

The Company monitors the effectiveness of its approach through:

- Tracking completion of training and awareness activity
- Reviewing supplier assessments and audit outcomes
- Monitoring concerns raised through reporting channels
- Periodic review of modern slavery risks and trends

We recognise that addressing modern slavery is an evolving process and commit to continuous improvement in our approach.

7. Training and Awareness

The Company provides appropriate training and awareness to:

- Managers and supervisors
- Employees involved in procurement or supplier management
- Employees working in higher-risk roles

Training aims to help individuals identify indicators of modern slavery, understand reporting routes, and act appropriately.

8. Whistleblowing Policy

Anyone who becomes aware of concerns relating to actual or suspected modern slavery is encouraged to report them as soon as possible.

Concerns may be raised through:

- Line management
- HR
- The Company's whistleblowing process

All concerns will be treated seriously and investigated appropriately. The Company is committed to ensuring that no one suffers detriment, retaliation, or disadvantage for raising concerns in good faith.

9. Protection of Workers and Non-Retaliation

The Company is committed to:

- Treating all workers with dignity and respect
- Ensuring employment is freely chosen
- Prohibiting intimidation, coercion, or exploitation

No employee or worker will suffer adverse treatment for refusing to work where they reasonably believe conditions could amount to modern slavery or forced labour.

10. Recruitment and Employment Practices

The Company aims to ensure:

- All employees have the legal right to work
- Recruitment practices are transparent and fair
- No recruitment fees are charged to workers
- Identity documents are never withheld as a condition of employment

11. Breaches of This Policy

Breaches of this policy by employees may result in disciplinary action, up to and including dismissal.

Breaches by suppliers, contractors, or business partners may result in:

- Required remedial actions
- Suspension or termination of the business relationship

12. Review and Continuous Improvement

This policy will be reviewed annually and updated as necessary to reflect:

- Changes in legislation or guidance
- Evolving best practice
- Lessons learned from monitoring and reporting