

# CELNOR GROUP

## Modern Slavery & Human Trafficking Policy

Policy Title	Modern Slavery & Human Trafficking Policy
Issued By	Celnor Group Ltd.
Effective Date	April 2026
Review Cycle	Annual
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Version	1.0

### Introduction and Scope

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Celnor Group Limited is committed to acting ethically and to preventing modern slavery and human trafficking in all areas of its business and supply chains. Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking.

As a provider of testing, inspection, certification and compliance services, Celnor recognises that risks may arise through the way people are recruited, engaged and treated, and through its supply chains.

This policy supports compliance with the Modern Slavery Act 2015 and applies to Celnor Group Limited and its subsidiary companies. It sets out the minimum standards expected across the Group. Group companies operate in a range of jurisdictions and are expected to comply with applicable local laws while aligning with this policy.

Group companies are responsible for implementing these requirements within their own operations and supply chains, supported by Group oversight. Suppliers, subcontractors and other business partners are expected to meet equivalent standards.

### Objectives

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Through this policy, Celnor aims to:

- ensure modern slavery risks are identified, understood and addressed in a proportionate and practical manner
- promote fair, lawful and respectful treatment of all people working within or connected to the Group
- set clear expectations for employees, suppliers and business partners
- support a culture where concerns can be raised safely and responsibly
- embed modern slavery considerations within wider governance, risk and ESG arrangements

### Responsibilities

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Clear roles and responsibilities are important to ensure that modern slavery risks are identified, managed and addressed in a practical and effective way. The responsibilities below set out how accountability and oversight for this policy are shared within Celnor Group and across its supply chains.

## **Board of Directors**

The Board holds ultimate accountability for ethical conduct across the Group and for ensuring that appropriate policies, governance and oversight arrangements are in place to manage modern slavery risk.

## **Executive Leadership Team**

The Executive Leadership Team is responsible for implementing this policy, ensuring adequate resources are available, and embedding modern slavery considerations into business decisions, risk management and operational practices.

## **ESG Committee**

The ESG Committee supports coordination and oversight of modern slavery-related activity across the Group. It monitors emerging risks, supports consistent implementation, and provides updates to senior leadership as required.

## **Managing Directors and Senior Leaders within Group Companies**

Leaders within Group companies are responsible for promoting compliance with this policy, ensuring local practices align with Group expectations, and escalating concerns or risks where identified.

## **Employees and Workers**

All employees and workers are expected to act in line with this policy, uphold ethical standards, and raise concerns if they become aware of practices that may indicate modern slavery or exploitation.

## **Suppliers and Business Partners**

Suppliers, contractors and business partners are expected to operate in accordance with applicable laws and with Celnor's ethical, labour and human rights expectations

## **Arrangements**

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Celnor maintains the following arrangements to support the prevention of modern slavery across the Group:

### **Recruitment and employment practices**

Celnor promotes fair, lawful and transparent recruitment and employment practices across the Group. This includes right-to-work checks, appropriate employment documentation, and compliance with applicable employment legislation.

Where recruitment agencies, labour providers or subcontractors are used, Celnor expects them to operate in accordance with legal requirements and recognised industry standards. This includes appropriate verification of workers and the use of fair and lawful employment arrangements.

Celnor does not tolerate forced labour, unlawful deductions, worker-paid recruitment fees, or exploitative employment practices. The Group promotes transparent and compliant pay arrangements and seeks to avoid practices that may increase the risk of worker exploitation.

### **Supplier standards and due diligence**

Celnor sets expectations for suppliers through contractual terms, supplier standards and onboarding processes. Where appropriate, suppliers may be asked to demonstrate compliance with labour and human rights requirements appropriate to the risk and nature of the services provided, this may include consideration of publicly available modern slavery statements or policies as a high-level indicator of supplier awareness and governance.

Where labour providers or recruitment agencies are engaged, appropriate checks are carried out to confirm their compliance with legal and ethical standards.

### **Risk awareness and assessment**

At Celnor Group level, modern slavery risks are considered within the wider ESG and risk management framework to provide oversight and direction. Celnor Group Ltd has completed a proportionate, Group-level modern slavery risk assessment based on key activity and supply chain categories across the Group.

The risk assessment builds on an initial scoping exercise and adopts a qualitative, category-based approach, taking account of how modern slavery risk may arise, the inherent level of risk, and the existing controls in place. Individual Celnor companies remain responsible for identifying and managing modern slavery risks within their own operations and supply chains.

The Group supports subsidiary companies through practical guidance and periodic information gathering to improve visibility of modern slavery risks across the Group.

The Group will continue to review and refine its approach as its framework and understanding mature.

### **Speaking up and escalation**

Celnor encourages openness and transparency. Colleagues are supported to raise concerns through local management or via confidential reporting and whistleblowing arrangements, including Group-wide support mechanisms. Concerns will be taken seriously and handled responsibly.

### **Training and awareness**

Modern slavery awareness is promoted as part of broader expectations around ethical behaviour and responsible practice. Targeted guidance and training will continue to be developed in line with risk and organisational maturity.

### **Monitoring and continual improvement**

Celnor recognises that modern slavery risk management is an evolving area. The Group is committed to continuous improvement through regular review of this policy, alignment with updated guidance, and the ongoing development of controls, oversight and supporting processes.

## **Review**

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This policy is reviewed periodically to ensure it remains suitable, effective and aligned with legal requirements, Government guidance and Celnor's wider ESG framework. Any significant updates will be communicated across the Group.

## **Approval**

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This policy has been approved by the Board of Directors of Celnor Group Limited.

Signed:



Name: Simon Parrington

Title: Group Chief Executive

Date: 27/05/2026