

CELNOR GROUP

Modern Slavery & Human Trafficking Policy

Policy Title	Modern Slavery & Human Trafficking Policy
Issued By	Celnor Group Ltd.
Effective Date	October 2026
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Introduction and Scope

Celnor Group Limited is committed to treating people fairly and helping to prevent modern slavery and human trafficking in our business and supply chains. We have zero tolerance for exploitation and will take practical, risk-based steps to prevent, identify and address it.

Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking. It may involve debt bondage, deceptive recruitment, restrictions on a person's movement, withholding wages or identity documents, or charging workers fees to obtain work.

This policy supports compliance with the Modern Slavery Act 2015 and other applicable employment, immigration and human rights laws, including legislation and Home Office requirements relating to the prevention of illegal working and right to work checks. These requirements may apply in certain circumstances beyond traditional employment arrangements, including some labour-supply and subcontractor arrangements.

This Policy applies to Celnor Group Limited, all Group companies, and everyone working for or on behalf of them. Suppliers and other business partners are expected to meet the same standards. Group companies must also follow the laws that apply where they operate.

Objectives

Through this policy, Celnor aims to:

- treat everyone working in or with the Group fairly, lawfully and with respect
- prevent modern slavery in our operations and supply chains
- identify and manage risks in a practical and proportionate way
- set clear expectations for colleagues, suppliers and business partners
- make it easy and safe for people to raise concerns
- monitor our approach and improve it over time

Responsibilities

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 this policy and is responsible for approving the annual modern slavery statement.

Executive Leadership Team and ESG Committee

The Executive Leadership Team and ESG Committee oversee implementation, risk, resources, progress and reporting across the Group.

Managing Directors and Senior Leaders within Group Companies

Leaders within Group companies are responsible for applying this policy locally, managing risks, keeping appropriate records and escalating significant concerns.

Employees and Workers

All employees and workers are expected to follow this policy, complete relevant training and speak up if something does not seem right.

Suppliers and Business Partners

Suppliers, contractors and business partners are expected to meet applicable laws and agreed standards, cooperate with proportionate checks and report credible concerns promptly.

Arrangements

Celnor maintains the following arrangements to help prevent modern slavery across the Group:

Recruitment and employment practices

Recruitment must be fair and transparent. Workers must receive clear terms they can reasonably understand, and right-to-work checks must be completed lawfully and in accordance with applicable Home Office requirements. Recruitment agencies and labour providers must meet legal and ethical standards, must not charge workers prohibited fees, and must hold any licence required for the services they provide.

We do not accept:

- forced, bonded, compulsory or trafficked labour
- worker-paid recruitment fees or arrangements that create debt bondage
- withholding wages, passports, identity documents, work permits or personal belongings
- unlawful deductions, pay below legal minimums, or excessive and unlawful working hours
- threats, coercion, violence, retaliation or restrictions on a person's freedom
- unlawful child labour
- misleading people about their work, pay, hours, location or accommodation

Where agency workers are used, Group companies should favour clear PAYE arrangements where reasonably practicable. Umbrella companies or other intermediaries must be considered carefully for employment, tax and exploitation risks.

Supplier standards and due diligence

We take a risk-based approach to suppliers, subcontractors, recruitment agencies and labour providers. We carry out more detailed checks where the type of work, labour model, location or supply chain indicates a greater risk of exploitation.

Our supplier arrangements may include:

- questions about recruitment, pay, working conditions, subcontracting and modern slavery controls
- checks on relevant policies, statements, licences, accreditations or other evidence
- contract terms and supplier standards that set clear expectations and require concerns to be reported
- additional checks or corrective actions for higher-risk relationships
- clear records of checks, decisions and follow-up actions

A supplier policy or public statement can be useful evidence, but it is not enough on its own. We consider the quality of the supplier's controls and the risks connected with the goods or services being provided.

Risk awareness and assessment

We review modern slavery risk through our wider ESG and risk-management arrangements. Our checks focus on areas where risk may be higher, including agency labour, subcontracted or labour-intensive services, facilities and property services, offshore support, and goods made through overseas or complex supply chains.

The Group maintains an overall risk assessment. Each Group company is responsible for understanding and managing risks in its own operations and supply chains, providing information through the annual Group process, and reviewing material changes such as acquisitions, new countries, new labour models or significant suppliers.

Responding to concerns

When a concern is raised, our priority is the safety and dignity of anyone who may be affected. We assess the concern promptly, protect confidentiality where possible, preserve relevant information and investigate appropriately.

Where a problem is found, we focus on putting matters right, addressing the underlying cause and preventing recurrence. Action may include repaying recruitment fees or wages, returning documents, improving employment arrangements, agreeing supplier corrective action, reporting matters to the appropriate authorities, suspending work or ending a business relationship where serious issues are not resolved. We will avoid action that could place affected people at greater risk.

Speaking up and escalation

We want people to speak up if they see or suspect exploitation, unfair recruitment or another breach of this policy. Concerns can be raised with a manager, local senior leader, HR, the ESG or Compliance team, or through our confidential whistleblowing arrangements. If there is an immediate risk to life or safety, the emergency services should be contacted.

We will take concerns seriously, handle them sensitively and not tolerate retaliation against anyone who raises a genuine concern or helps with an investigation. Material concerns must be escalated promptly to appropriate senior leadership and, where necessary, the Board or relevant authorities.

Training and awareness

We will communicate this policy to our workforce and provide proportionate awareness and role-based training. Additional guidance will be provided for colleagues involved in recruitment, procurement, supplier management, operational delivery, acquisitions and other higher-risk activities. Training and communication records will be retained.

Monitoring and continual improvement

The ESG Committee will monitor implementation and report progress at least annually. This may include subsidiary risk returns, training completion, checks on higher-risk suppliers and labour providers, concerns raised, corrective actions and remediation outcomes. A low number of reports will not, by itself, be treated as evidence that risk is low.

We will use findings from risk reviews, supplier checks, incidents, acquisitions and employee concerns to improve our controls and future reporting. Celnor will also publish an annual Modern Slavery and Human Trafficking Statement where required, explaining the steps taken during the relevant financial year and retaining evidence to support the information reported.

Records, confidentiality and breaches

Records must be accurate, securely retained and shared only where needed. Personal information about potentially affected people or witnesses must be handled in line with applicable data protection law and Celnor policies.

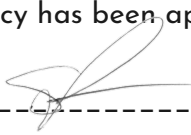
Breaches of this policy may lead to disciplinary action or contractual remedies, including termination, subject to applicable law and procedure. Suspected criminal conduct may be reported to the relevant authorities.

Review

This policy will be reviewed at least annually and sooner if there is a material incident, significant legal or organisational change, entry into a higher-risk market, or a material change to the Group's workforce or supply chains. Any significant updates will be communicated across the Group.

Approval

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

Signed:  -----

Name: Simon Parrington

Title: Group Chief Executive

Date: 1st October 2026