



HUMAN RIGHTS AND THE PREVENTION OF MODERN SLAVERY POLICY

1. POLICY STATEMENT

- 1.1 We are committed to respecting fundamental human rights, as expressed in the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.
- 1.2 Modern Slavery is a crime and a violation of fundamental human rights, involving the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This includes, but is not limited to:
- (a) Holding another person in slavery or servitude,
 - (b) requiring another person to perform forced or compulsory labour, or,
 - (c) arranging or facilitating the travel of another person with a view to them being exploited (human trafficking).
- 1.3 We adopt the standards set out by the Ethical Trading Initiative (ETI) Base Code¹, and we expect Suppliers to meet these conditions as a minimum.
- 1.4 Our approach to human rights due diligence and the prevention of modern slavery is aligned to the OECD Due Diligence Guidance for Responsible Business Conduct. We recommend Suppliers also follow this best practice.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The HR department have direct responsibility for implementation of this policy for employees.
- 2.2 All employees in the business are responsible for upholding and protecting the human rights of others, and preventing modern slavery, both within the business and in our supply chains.
- 2.3 The compliance manager for human rights and the prevention of modern slavery is the Sustainability Manager, who has responsibility for the implementation and monitoring the use and effectiveness of this policy.

3. OUR COMMITMENTS

- 3.1 Matthew Algie has a zero tolerance approach towards modern slavery and human rights violations and are committed to implementing systems to ensure this does not occur within our operations, or within our supply chain. This includes a commitment to:
- (a) Avoid causing or contributing to adverse human rights through our own activities, and addressing them when they occur.
 - (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services through our business relationships.

- 3.2 We are committed to ensuring a transparent approach to tackling modern slavery in our supply chain, consistent with our obligations under the Modern Slavery Act (2015).
- 3.3 We are committed to ensuring all employment within our business and supply chain is completely free from coercion or exploitation. All workers must be free to choose and leave their employment without threat, penalty, or forced conditions. We prohibit any form of harassment, restriction of movement, forced overtime, or withholding of personal documents.
- 3.4 We are committed to managing our recruitment process responsibly, including, age verification and no worker-paid fees or debt-based coercion. We do not use disciplinary measures that result in forced labour. We hold our contractors, suppliers, and labour providers to the same high standards, conducting audits and requiring alignment with our policies.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 All employees are made aware of this policy as part of their induction and training is given to all employees annually.
- 4.2 Our zero-tolerance approach to human rights violations and modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

- 5.1 You must notify your line manager if you suspect there has been a breach of this policy. The *Whistleblowing Policy* can be used for guidance.
- 5.2 If a Supplier is suspected of breaching the standards set out by the ETI Base Code, you must notify your line manager, or the compliance manager. The *Whistleblowing Policy* can be used for guidance.
- 5.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Furthermore, we may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Endorsed: Thomas Heinen – Managing Director
 Date: 23/10/2025

Endorsed: Neil Freckingham – Operations Director
 Date: 23/10/2025