

POLICY ON ANTI-SLAVERY AND HUMAN TRAFFICKING

1. Policy Statement

- 1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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. We have a zero-tolerance approach to modern slavery and M.P.Evans Group PLC (the "Group") is committed to acting ethically and with integrity in the way it conducts its business and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in the Group or in any of its suppliers.
- 1.2. Consistent with its disclosure obligations under the Modern Slavery Act 2015, the Group is committed to ensuring transparent internal reporting and disclosure of any breaches that come to light within both the Group and its suppliers. The Group is also committed to communicating clearly its approach to tackling modern slavery to its employees and suppliers: it expects the same high standards from all of its contractors, suppliers and other business partners. As part of its contracting processes, the Group includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that any suppliers will hold their own suppliers to the same standards.
- 1.3. This policy applies to all persons working for the Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4. This policy does not form part of any employee's contract of employment and the Group may amend it at any time.

2. Responsibility for the policy

- 2.1. The board of directors has overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations, and that all those under its control comply with it.
- 2.2. The Group chief financial officer, Luke Shaw, has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in the Group and its suppliers.
- 2.4. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group company secretary, Katya Merrick.

3. Compliance with the policy

- 3.1. All employees have an obligation to read, understand and comply with this policy.
- 3.2. The prevention, detection and reporting of modern slavery in any part of the Group or its suppliers is the responsibility of all those working for the Group or under its control.
- 3.3. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Group or amongst its suppliers at the earliest possible stage.

- 3.4. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager where appropriate, the Group chief financial officer or Group company secretary (enquiries@mpevans.co.uk) or report it, in confidence, via the independently run **whistleblowing hotline : telephone/SMS/WhatsApp +62 812 8250 5042** email: wb@evansproactive.com as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, the Group will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 3.5. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions constitutes any of the various forms of modern slavery, you should raise it with your manager where appropriate, the Group finance director or Group company secretary or through the confidential whistleblowing hotline. All notifications will be taken seriously and reviewed.
- 3.6. The Group aims to encourage openness, so will support anyone who raises genuine concerns in good faith under this policy and ensure they do not suffer any detrimental treatment, irrespective of whether they turn out to be mistaken. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group finance director immediately. If the matter is not remedied, and you are an employee, you should raise it formally by using our grievance procedures or by notifying the board of directors.

4. Communication and awareness of this policy

- 4.1. Training on this policy, and on the risk the Group faces from modern slavery in its supply chains will form part of the induction process for all individuals who work for the Group. Refresher training will be provided as necessary.
- 4.2. The Group intends that its approach to modern slavery should be 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. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2. The Group may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

Reviewed by the board June 2025

Updated March 2026

First Issued: July 2017
Last review: June 2025

Review history: June 2024
June 2023
June 2022
June 2021
November 2020