Modern Slavery Policy - 01 March 2026

POLICY STATEMENT

Modern Slavery is a crime and a violation of fundamental human rights. It can take various forms as outlined in the following:

1. Overview and how we define Modern Slavery

1.1 Slavery, forced labour, servitude, and human trafficking are types of 'Modern Slavery' – criminal activity that deprives victims of their liberty and usually involves financial and other exploitation.

1.2 We conduct our business fairly, ethically and with respect to fundamental human rights. We are committed to the prevention of all forms of Modern Slavery, both in our business and in our supply chains. We will not tolerate it.

1.3 You must read and comply with this policy if you work for, or on behalf of us in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.

1.4 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and us. It could also involve other legal steps being taken against you.

1.5 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. Our Anti-Slavery Officer ('ASO') is Julie Palmer. Our ASO has primary and day-to-day responsibility for implementation of this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery.

1.6 If you are an employee, this policy does not form part of your employment contract, and we may update it at any time.

2. Preventing Modern Slavery in our business

2.1 We carry out appropriate checks on all employees, recruitment agencies and suppliers, so that we know who is working for us or on our behalf.

2.2 We give every employee a written employment contract, and he or she is paid in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

[2.3 All employees are required to sign a copy of this policy to show they have read and understood it.]

3. If you are one of our Suppliers

3.1 If you supply us with goods or services, you must assess your business and supply chains and confirm to our ASO that you:

- comply with your legal obligations, in relation to Modern Slavery; and
- are committed to ensuring there is no Modern Slavery taking place in your business, or in any of your supply chains.

You must also provide a copy of your anti-slavery policy.

3.2 If you breach this policy or are found to have Modern Slavery in your business, or knowingly in your supply chain, we may terminate our contract with you and pursue legal remedies against you.

4. If you are an Employee or a Worker providing services for us

4.1 You must immediately report any suspicions of Modern Slavery in our business or supply chains to our ASO. Our ASO will investigate and report to our Board of Directors within a reasonable time, on actions which may require to be taken.

4.2 You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately tell our ASO and, if you are an employee, refer to our Grievance and Whistleblowing Policies.

5. Our Policies in Relation to Modern Slavery

Ethical Trading Policy- setting out our strategic approach and key principles and priorities that apply to all our procurement activities.
Equality and Diversity Policy- ensuring appropriate procedures are in place to prevent any breaches to international human rights standards.

6. Training

Regular training on this policy and on the risk that the business faces from modern slavery in it's supply chains will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

For and behalf of
J.G Paxton and Sons Ltd.

Peter J Tallentire
Managing Director
1 March 2026