

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY



1. PURPOSE

- 1.1 Modern slavery is a violation of fundamental human rights, it exists in several forms across the world, which are identified as crimes under UK law. This policy statement defines the Company's compliance with the Modern Slavery Act 2015, and the commitment to ensuring that modern slavery does not exist in the Augean Group (together, "Augean", "the Group", "we", "us" or "our"), contractors or supply chains.
- 1.2 Augean is committed to preventing modern slavery, forced labour, human trafficking and exploitation in our operations and supply chains. We have zero tolerance for any form of modern slavery.
- 1.3 The purpose of this policy is to:
 - set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
 - provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

2. MODERN SLAVERY FORMS

- 2.1 "Modern slavery" is an umbrella term. While the term itself is not specifically defined in the Modern Slavery Act 2015, the Act makes it a criminal offence to hold a person in slavery or servitude, require a person to perform forced or compulsory labour, or arrange or facilitate the travel of another person for the purpose of exploitation (human trafficking). In simple terms, modern slavery involves depriving an individual of their freedom in order to exploit them for personal or commercial gain. It takes several forms:
 - **Slavery and Servitude** – Holding another person in slavery or servitude, where the circumstances are such that the person knows or ought to know the other is so held. These terms are construed in line with Article 4 of the European Convention on Human Rights.
 - **Human Trafficking** – The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the use of threat, force or coercion for the purpose of exploitation.
 - **Forced Labour** - All work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.
 - **Harmful Child Labour** – Consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child's education or be harmful to the child's health, or physical, mental, spiritual, moral or social development.

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3. SCOPE

- 3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, suppliers, third-party representatives and business partners.

4. COMMITMENTS

- 4.1 Augean will:

- Comply with applicable legislation relating to modern slavery.
- Conduct business ethically and with integrity.
- Assess modern slavery risks within our operations and supply chains.
- Implement due diligence processes for suppliers.
- Act on concerns raised regarding modern slavery.
- Support transparency and responsible sourcing.
- Provide modern slavery awareness training to employees.
- Deliver enhanced training to procurement, HR and contract management teams.
- Ensure managers understand indicators of exploitation and forced labour.
- Raise awareness of reporting mechanisms.
- Produce and publish an annual modern slavery statement where required under section 54 of the Modern Slavery Act 2015 and ensure a link to the statement is displayed prominently on our homepage.
- Obtain Board approval and director sign-off of the statement.
- Report on actions taken, risks identified and effectiveness measures.
- Maintain evidence supporting statements and claims.

- 4.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

5. RESPONSIBILITY

- 5.1 The Board of Directors provides oversight of modern slavery risks and has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

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- 5.2 The Senior Leadership Team (SLT) 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.
- 5.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 5.4 Anyone involved with procurement or the supply chain is responsible for ensuring that suppliers are assessed and that modern slavery considerations are embedded into procurement activities.
- 5.5 Employees are responsible for remaining vigilant to indicators of modern slavery and reporting any concerns promptly.

6. COMPLIANCE WITH THIS POLICY

- 6.1 The Group will comply with its responsibilities in accordance with the Modern Slavery Act 2015.
- 6.2 The Group will not tolerate any form of modern slavery and will take all reasonable steps to ensure that human trafficking and slavery do not exist within its own business, supply chains, or those of the organisations who undertake works on its behalf. Reasonable steps will include:
 - Carrying out robust checks on identity before employment commences to ensure that all employees are legally eligible to work in the UK in accordance with the relevant legislation as documented in the Government publication “Right to Work Checks: an employer’s guide” (latest version 1 October 2026, or as reasonably updated) available from: <https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>.
 - Verify the identity of workers and agency staff.
 - Ensure workers retain possession of their own passports and identity documents.
 - Ensuring that all employees have and use a UK postal address.
 - Ensuring that all employees receive at least the National Minimum Wage or National Living Wage, dependent on their age.
 - Ensure wages are paid directly to employees rather than through third parties where possible into a named UK bank account in that employee’s name.
 - Review recruitment practices to identify indicators of worker exploitation.
 - Use reputable employment agencies and labour providers.

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- Ensuring that all employees working hours are kept within the relevant Working Time Regulations.
- 6.3 You must ensure that you read, understand and comply with this policy.
- 6.4 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 6.5 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur.
- 6.6 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain of any supplier tier at the earliest possible stage.
- 6.7 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.
- 6.8 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.
- 6.9 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. 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 your line manager or General Manager.
- 6.10 However, where the matter is more serious, or you feel that your line manager or General Manager (or equivalent) has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact either the Group General Counsel or HR Manager. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook.
- 6.11 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 6.12 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 HR Director.

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7. REQUIREMENTS FOR SUPPLIER ORGANISATIONS

7.1 We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Reasonable checks on suppliers will include:

- Require supplier onboarding questionnaires that include modern slavery considerations.
- Assess suppliers based on labour risk exposure.
- Carry out periodic supplier reviews and audits.
- Request evidence of employment practices from higher-risk suppliers.
- Monitor adverse media and regulatory reports relating to suppliers.
- Conduct enhanced due diligence on higher-risk suppliers.
- Obtain supplier confirmation of compliance with applicable labour laws.
- Require suppliers to comply with a Supplier Code of Conduct.
- Include contractual clauses prohibiting modern slavery and allowing audit rights.
- Consider requiring key suppliers to publish their own modern slavery statements where applicable.

7.2 Upon request, supply chain companies must be able to demonstrate compliance with this policy to the reasonable satisfaction of Augean. Augean reserves the right to perform unannounced audits on its supply chain to confirm compliance and those supply chain companies are expected to cooperate with any such audit.

7.3 Training on the signs that may indicate the presence of Modern Slavery within our company or supply chain form part of the induction process for all new individuals joining Augean. For existing individuals, training will be provided and updated as necessary.

7.4 We are aiming for our commitment to addressing the issue of modern slavery in our business and supply chains to be communicated where possible to all suppliers, contractors and business partners at the outset.

8. BREACHES OF THIS POLICY

8.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

8.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

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9. POLICY REVIEW

9.1 This policy will be reviewed every 12 months from the point of first issue, or latest update.

A handwritten signature in blue ink that reads 'Richard Brooke'.

Richard Brooke
Chief Executive Officer

Issued: October 2026