

AUGEAN GROUP MODERN SLAVERY STATEMENT 2025



For the financial year ended 31 December 2025

Final Draft for Board approval and publication in 2026

1. OUR COMMITMENT

This statement is made by Augean Limited on behalf of the Augean Group (together, "Augean", "the Group", "we", "us" or "our") pursuant to section 54(1) of the Modern Slavery Act 2015. It describes the steps taken during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking in our operations and supply chains.

Modern slavery is a serious violation of human rights and may include slavery, servitude, forced or compulsory labour, human trafficking and harmful child labour. Augean is committed to acting ethically, transparently and with integrity, and to maintaining proportionate systems and controls designed to identify, assess and address modern slavery risks. We expect the same high standards from those who work with us or on our behalf.

2. ORGANISATION, OPERATIONS AND SUPPLY CHAINS

Augean is a UK-based specialist waste management group. We provide compliance-led waste treatment, recycling, recovery, disposal and specialist industrial services, including services for hard-to-handle wastes across critical sectors such as defence, utilities, renewable energy, infrastructure and construction, nuclear and radioactive, processing and manufacturing, and oil and gas. Our activities are carried out through UK operating businesses and a network of sites and service centres. The Group employed 611 people across its sites in the United Kingdom in 2025.

Our supply chains include goods and services required for us to operate regulated waste facilities and deliver services to customers. Principal categories include plant and equipment; haulage and logistics; construction and engineering services; personal protective equipment and workwear; agency labour and recruitment; facilities management; information technology; utilities; chemicals and consumables; professional services; and specialist subcontracted services.

The Group's registered office is at 4 Rudgate Court, Walton, Wetherby, West Yorkshire, LS23 7BF.

3. GOVERNANCE AND POLICIES

The Board has overall responsibility for ensuring that the Group's approach to modern slavery remains appropriate and that this statement is approved. Day-to-day implementation is supported by relevant functions across procurement, human resources, legal and compliance, health and safety, operational management and Environmental, Social and

AUGEAN GROUP MODERN SLAVERY STATEMENT 2025



corporate Governance (ESG). Managers are responsible for promoting compliance within their areas of control and escalating concerns.

Our Anti-Slavery and Human Trafficking Policy applies to all persons working for or on behalf of the Group, including employees, directors, officers, agency workers, contractors, consultants, suppliers, third-party representatives and business partners. It is supported by related arrangements, including recruitment and right-to-work controls, whistleblowing and speaking-up channels, standards of business conduct, procurement controls, supplier onboarding, and health and safety management policies. These policies are published on our intranet. We prohibit retaliation against anyone who raises a concern in good faith.

We expect contractors, suppliers and other business partners to comply with applicable law and to prohibit forced, compulsory or trafficked labour and child labour in their own operations and supply chains. Where appropriate, these expectations are reflected in due diligence, supplier declarations, contractual terms and our right to seek further information or take corrective action.

4. RISK ASSESSMENT

We operate in the United Kingdom and our operations are subject to established employment, environmental, health and safety, and regulatory requirements. Nevertheless, modern slavery risk can arise through complex or lower-visibility supply chains, subcontracting, temporary or agency labour, labour-intensive services, recruitment practices, and goods sourced from higher-risk sectors or jurisdictions.

We apply a proportionate, risk-based approach to supplier engagement and use of agency or temporary workers. Relevant factors may include the nature of the goods or services, labour model, use of subcontractors, country of origin, value and criticality of the relationship, adverse information, and the supplier's own policies and controls. Higher-risk indicators may lead to enhanced questions, documentary evidence, contractual protections, management review, an improvement plan, audit activity or, where necessary, suspension or termination of the relationship.

Suppliers are required to confirm, amongst other things, that they have implemented practices and due diligence checks to ensure that modern slavery, child labour and human trafficking are not taking place in their supply chains or any part of their business.

5. DUE DILIGENCE AND ONGOING MONITORING

We communicate our standards to relevant suppliers and contractors during onboarding and contracting.

We use proportionate pre-qualification and compliance checks, including questions relevant to labour standards and modern slavery. These are delivered using procedures ('Purchasing

AUGEAN GROUP MODERN SLAVERY STATEMENT 2025



and Supplier Evaluation' and 'Control of contractors and agency staff') for suppliers and contractors that are part of our Integrated Management System (IMS) (ISO9001, ISO14001 and ISO45001).

We require relevant suppliers to confirm compliance with applicable legislation and may request supporting policies, statements or evidence.

We assess concerns, adverse information and material changes in a supplier's ownership, operating model or risk profile.

We maintain routes for workers and third parties to raise concerns, including confidential escalation through the Group's Whistleblowing Policy.

We investigate credible concerns promptly and determine appropriate remediation, recognising that protecting affected people is central to an effective response.

6. TRAINING AND AWARENESS

We provide information and training proportionate to role and risk. Modern Slavery training is provided to employees on induction and thereafter every three years.

Relevant colleagues, including those involved in procurement, recruitment, contract management, operations and people management, are expected to understand common indicators of exploitation, how to respond safely, and how to report a concern.

Modern slavery requirements are reinforced through policy communications and, where appropriate, supplier engagement.

7. ASSESSING EFFECTIVENESS

We monitor the effectiveness of our approach through management oversight and selected measures:

Measure	Outcome
Relevant employees completing modern slavery training	95
Modern slavery concerns raised through formal reporting channels	Our reporting channels were available throughout the year, no modern slavery concerns were raised.
Corrective actions or improvement plans opened and closed	None required

8. PRIORITIES FOR 2026

Our priorities for 2026 are:

- Review and refresh the Group's Modern Slavery Policy.
- Strengthen the recording of supplier screening decisions, enhanced reviews and agreed corrective actions.
- Implement a Supplier Code of Conduct.
- Suppliers will be required to confirm compliance through the supplier onboarding process.
- Require key suppliers to maintain equivalent modern slavery policies and provide annual confirmation of compliance.
- Review contractual provisions and supplier communications to ensure expectations remain clear and proportionate.
- The Company will strengthen the risk-based approach to supplier management, combining both financial exposure and ESG risk factors to determine the level of due diligence and monitoring required. Supplier categories identified as presenting elevated ESG risks include:
 - Labour and people services.
 - Waste management and environmental services.
 - Fleet and transport providers.
 - Property and facilities contractors.
 - IT and data service providers.
- Higher-risk suppliers will be subject to additional review, monitoring and approval requirements.
- Deliver targeted refresher training for relevant procurement, recruitment, operational and contract-management roles.
- Develop a wider scope of KPIs to enable management reporting.

9. RAISING A CONCERN

Anyone working for or with Augean who becomes aware of, or suspects, modern slavery in our operations or supply chains should report it promptly through their manager, or via other channels in accordance with the Whistleblowing Policy. External parties, such as suppliers or contractors, can raise concerns using the contact form on the website (<https://www.augean.co.uk/contact/>) or by email (info@mail.augean.co.uk).

AUGEAN GROUP MODERN SLAVERY STATEMENT 2025



Where there is an immediate risk of harm, the appropriate emergency services or competent authority should be contacted. Reports will be considered sensitively and investigated in accordance with applicable procedures.

10. BOARD APPROVAL

This statement was approved by the Board of Augean Limited on 28 October 2026 and signed on its behalf by the following director:

Richard Brooke

Director

Augean Limited

28 October 2026