

## **Modern Slavery Act Statement**

### **Financial Year Ended 31<sup>st</sup> December 2025 – Reported 30<sup>th</sup> June 2026**

This statement is made pursuant to s. 54 of the Modern Slavery Act 2015 and sets out the steps that Epwin Group Limited and its subsidiary undertakings, including Specialist Building Products Limited and Specialist Building Contracting Limited, (“Epwin” or “the Group”) have taken and will continue to take to address the risk of modern slavery or human trafficking taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

#### **Our business**

Epwin Group is a vertically integrated manufacturer of energy efficient, low maintenance building products, supplying products and services to the Repair, Maintenance and Improvement (“RMI”), new build and social housing sectors. The Group is a leading manufacturer of a broad range of PVC, aluminium, Glass Reinforced Plastic (“GRP”) and Wood Plastic Composite (“WPC”) energy efficient, low maintenance building products and services. In addition, the Group recycles post-consumer and post-industrial PVC building materials, including PVC window frames. The Group’s operations are wholly located within the UK, comprising a number of manufacturing and fabrication facilities and trade distribution centres.

Epwin is committed to best corporate practices and ethical values and has a zero-tolerance approach to any form of modern slavery. The Group is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### **Risk areas**

The parts of our operations where we consider there is a risk of modern slavery are our supply chain and people.

##### *Supply chain*

The Group sources raw materials, components and equipment predominantly from UK suppliers. However, these supplies, or elements of them, may originate from overseas locations that have been identified by the Group as carrying a higher risk of modern slavery. Parts of the Group provide supply and fit services directly to UK customers. In some cases, the installation services may be provided by subcontractors. There is a risk that the installers provided by the subcontractors could be involved in modern slavery and human trafficking, or that they are paid less than the minimum statutory pay provisions.

Where possible, in particular for our key raw materials, we build long-standing relationships with our core suppliers and communicate with them regularly. This ensures that we understand their business and that they understand our expectations around ethical behaviour. We periodically perform a risk assessment in relation to our key suppliers. We have a robust due diligence process where we do engage with new suppliers, to ensure they meet our high standards of ethical and business conduct, and we seek where possible to incorporate terms and conditions relating to Modern Slavery Act provisions in new supply contracts. A review of key suppliers is part of the due diligence process where acquisitions are made by the Group.

As the Group only operates in the UK, we manufacture the majority of our own products and source primarily from UK-based suppliers, we view our overall risk to be low.

##### *People*

The Group employs more than 2,000 people in the UK. Our employment contracts provide that all our employees must adhere to a code of ethics as set out in our Employee Handbook provided to all employees on joining the Group, with specific policies in relation to anti-harassment and bullying. In addition, all employees are encouraged to report any concerns under our whistle-blowing policy. No

Epwin employees are paid cash in hand. This ensures we minimise the risk of illegal working as well as modern slavery practices.

The Group uses agency workers within its manufacturing and distribution operations. There is a risk that the source of the agency workers could be involved in modern slavery and human trafficking or that they are paid less than the minimum statutory pay provisions. This is the area of our operations where we considered modern slavery risks to be most significant.

Following a review of all recruitment agencies used across the group, which included the completion of questionnaires and some site visits, a preferred supplier list was established. A register was compiled with the results of our risk assessment for each supplier, which is monitored regularly to ensure any follow-up enquiries or actions are addressed. Terms and conditions have been reviewed to ensure they all incorporate clauses that provide the Group the ability to audit and act if issues relating to modern slavery and human trafficking are identified.

Agency spend is reviewed frequently to ensure that, where new agencies are identified, a full risk assessment and due diligence procedures are performed.

When acquisitions are completed, modern slavery risk areas are reviewed as part of the due diligence process and during the integration of the acquired business into the wider Group.

As a result of the actions we have taken and controls we have introduced, and considering that we use a limited number of specified, reputable employment agencies to source labour, we view our overall risk in this area to be low.

### **Training**

Modern slavery training is mandatory for all members of senior management and other employees responsible for functions where the risk of exposure to modern slavery and human trafficking is considered to be higher. Refresher training is required on a periodic basis for existing employees, with a quarterly review of new starters in addition to internal promotions and job changes to ensure the register of employees required to complete the training is up to date.

The Group extends the coverage of modern slavery training further, as appropriate, to include more of the Group's employees in order to ensure awareness of modern slavery is high. We continue to monitor the completion of training by each relevant employee in relation to modern slavery as a key performance indicator in relation to our compliance with Modern Slavery Act provisions.

### **Conclusion**

The Epwin Group is committed to upholding the highest ethical standards. As our business continues to grow, we will continue to review and strengthen our existing safeguards.

### **Approval of this statement**

This statement was approved and signed on behalf of the Board of Directors on 30<sup>th</sup> June 2026 by:

Jonathan Bednall

Chief Executive Officer