

HEATHCOTE HOLDINGS LIMITED

MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR 2026

Scope of this statement

For the purposes of this Modern Slavery Statement, references to “the Company” include Heathcote Holdings Limited and all subsidiary companies. The term “The Company” is used collectively throughout unless otherwise specified.

Introduction

As a business we are aware of the constantly changing issue of modern slavery and human trafficking and how it affects all types of sectors and industries. The Company is committed to operating in a transparent and responsible manner, striving to attain the highest ethical standards and respect for human rights. This includes reducing the risks of modern slavery throughout our business and supply chains.

We take a zero-tolerance approach to any form of modern slavery, forced labour, servitude, human trafficking, bonded labour or child labour. We seek to ensure that employees, workers, managers, suppliers and labour providers are alert to suspicious or concerning activity and understand how to report concerns.

Organisational Structure and Supply Chains

Heathcote Holdings Limited is a Kent-based agricultural, plant hire, resource management and recycling specialist delivering a range of specialised resource management services to private and public sector clients.

The Company and its subsidiaries provide services for the recycling of plasterboard, cardboard, plastics and waste wood, the manufacture of refuse-derived fuel and sustainable peat-free compost, and agricultural, plant hire and groundwork services.

This statement covers Heathcote Holdings Limited and all of its subsidiary companies. Within the supply chain there are relationships with external businesses for the sourcing of waste products, the purchase of plant and equipment, and the provision of services, materials and labour support. These suppliers form part of the wider supply chain across the Heathcote Holdings group of companies.

We work closely with suppliers to mitigate risks by taking a transparent, structured, aligned and sustainable approach to tackling modern slavery across the Company. This is led by our HR and Compliance teams with the support of the Management Team and Board.

Governance and Accountability

The Company's approach to modern slavery prevention is overseen through HR, Compliance, operational management and senior leadership review. Accountability is supported through clear ownership of policies, supplier due diligence, training, reporting and escalation routes.

Area	Responsible oversight
Policy management	HR, with senior leadership approval
Supplier due diligence	Procurement, Compliance and operational management
Employee and agency worker awareness	HR and site management
Whistleblowing and reporting	HR and Management Team
Board reporting	Group HR Director / senior leadership

Policies on Modern Slavery

We fully support and respect human rights as a fundamental belief of Heathcote Holdings and its group of companies. We do not engage in or accept any form of bonded, forced or child labour. We expect the businesses who work with us to follow these principles and will not knowingly work with those that do not.

Employees are encouraged to report any concerns internally or through the Whistleblowing Policy, which is widely publicised throughout the business.

External Partnerships

As modern slavery is a global issue, the Company collaborates with and supports industry and prevention bodies. We continue to reference and use the resources of Stronger Together and the Gangmasters and Labour Abuse Authority to develop our principles and practical approach to tackling modern slavery within our business.

Due Diligence Processes — Risk Assessment

The Company undertakes due diligence when considering new suppliers and regularly reviews existing suppliers. As part of the due diligence process, the supplier approval process and subsequent audits may incorporate a review of controls undertaken by the supplier.

Due diligence checks may include compliance questionnaires, supplier review meetings, audits, contract review, document checks and follow-up actions where risks or gaps are identified. These processes are intended to identify potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking.

In the next financial year the Company is committed to undertaking the following activities:

- Reviewing the current supply chain to ensure modern slavery risk remains understood, proportionate and appropriately documented.
- Raising awareness with suppliers of the resources available through Stronger Together and encouraging adoption of relevant principles and resources.
- Liaising with industry bodies and relevant advisers to support compliance with labour standards and modern slavery prevention.
- Reviewing labour providers and higher-risk suppliers using a risk-based approach, particularly where agency, temporary, seasonal or lower-paid labour is involved.
- Improving evidence capture so that actions, training, supplier checks and outcomes can be demonstrated for tender, audit and Board reporting purposes.

Risk Areas and Controls in 2026

The Company recognises that modern slavery risk can be higher in labour-intensive, operational and multi-tier supply chains. The following areas are treated as priority areas for awareness and monitoring:

- Agency labour and temporary workers.
- Drivers, operational site roles and roles involving flexible labour demand.
- Seasonal agricultural labour and subcontracted services.
- Cleaning, security, PPE, workwear, maintenance and equipment supply chains.
- Imported equipment, manufactured goods and materials where extended supply chains may make visibility more difficult.

Controls include right-to-work checks, employee induction, agency and labour provider review, supplier questionnaires, whistleblowing routes, employee rights awareness, management escalation, and review of policies and procedures.

Training and Raising Awareness

The Company continually works to raise awareness among employees and agency labour. Stronger Together resources are used to support awareness, and workers are made aware during induction, including through relevant information in appropriate languages where required.

Stronger Together workplace posters are displayed in prominent areas throughout the business. During the forthcoming year, the Company will reinforce training in toolbox-style awareness sessions for managers and operational teams where appropriate.

Measuring Effectiveness

The Company will continue to improve how it measures the effectiveness of its modern slavery prevention activity. A key target remains 100% completion of relevant training and understanding for employees where training is assigned as part of induction or refresher activity.

Measure	Target / evidence	Review frequency
Training completion	100% of new starters where assigned	Monthly / quarterly
Agency and labour provider review	Annual or risk-based review completed	Annual
Supplier due diligence	Critical or higher-risk suppliers reviewed	Annual / onboarding
Whistleblowing and concerns	Concerns logged, reviewed and escalated where required	Quarterly
Board / senior leadership reporting	Annual summary of activity, risks and improvement plan	Annual

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Heathcote Holdings Limited Modern Slavery Statement for the financial year ending 30 April 2026.

I, the undersigned, take responsibility for this statement and represent the Board of Heathcote Holdings Limited. I confirm this statement will be reviewed and updated annually.

Maria Northwood

Group HR Director

Date: July 2026

Questions regarding this statement or requests for further information should be made to our HR Team.

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