

Modern Slavery Act Statement 2026

Halma plc



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Introduction



A message from our CEO



*"WE OPERATE ETHICALLY,
TRANSPARENTLY AND WITH
INTEGRITY IN ALL THAT WE DO"*

As the Group Chief Executive, I lead this important agenda for Halma and our Group and will report annually on the steps that we have taken and will be taking to prevent modern slavery.

A copy of this Statement is available on the Company's website at www.halma.com and also at the Modern Slavery Statement Registry.

This statement was approved by the Board of Halma on 4 June 2026 and signed on its behalf by:

A handwritten signature in black ink, appearing to read 'Marc Ronchetti'. The signature is fluid and cursive, written over a white background.

Marc Ronchetti
Group Chief Executive

4 June 2026

Halma Modern Slavery Compliance Statement

Halma plc (Halma) supports the provisions set out in the Modern Slavery Act 2015 (the "Act") and has taken steps to prevent modern slavery occurring in its supply chain and within its own operations. This statement has been published in accordance with Section 54 of the Act and applies to Halma and its subsidiaries (the "Group") in respect of the financial year ended 31 March 2026. The individual companies which currently meet the requirement to report under the Act and those companies that do not currently meet the requirement to report under the Act, but have in prior years, have been specifically mentioned in this Statement and cover approximately over 60% of total sales revenue.

www.halma.com

<https://www.halma.com/investors/annual-report>

About Halma: Business Structure



Halma is a global group of life-saving technology companies. Our companies provide innovative solutions to many of the key problems facing the world today. Halma employs over 9,000 people in nearly 50 businesses operating in more than 20 countries. We have a lean and highly decentralised structure, and each business is a separate legal entity and has its own board of directors with accountability for implementing controls set by Halma's group legal and compliance framework.

Our purpose - to grow a safer, cleaner, healthier future for everyone, every day - drives our strategy and culture. Our companies and products have a core focus on safety, health and environmental markets.

Our businesses are grouped within three sectors:

Safety: Technologies that save lives, protect infrastructure and enable safe movement, and also technologies that protect people and assets at work across a range of critical industrial and logistics operations.

Environmental & Analysis: Technologies that monitor and protect the environment and ensure the quality and availability of life-critical resources.

Healthcare: Technologies that enhance the quality of life for patients and improve the quality of care delivered by healthcare providers.

More information about our sectors is available on www.halma.com.



Halma locations and supply chains



Our companies operate in predominately low risk countries*. More information about our companies and what they do, as well as their locations and corporate offices can be found on our website, www.halma.com.

As a decentralised business, each company is responsible for managing and mapping its supply chain and consequently its supplier due diligence. Each of our c.50 businesses are unique from one another and consequently have their own inherent supply chain and labour risks, which are managed at the business rather than Group level in order to preserve our autonomous business model. Further information on our companies supply chain and labour management, and due diligence activities can be found on pages 19 – 45.

Companies can also request support and guidance in respect of their supply chains from the Group, for example through participation in our Supply Chain Working Group, the purpose of which is to help develop future supply-chain related policies and due diligence procedures and through the recently implemented IntegrityNext platform.

* 74% of our companies operate in countries considered to be low risk for modern slavery; 23% of our companies operate in countries considered to be medium risk for modern slavery; and 3% of our companies operate in countries considered to be high risk for modern slavery, as defined according to our own assessment of risk using the Walk Free Global Slavery Index 2023

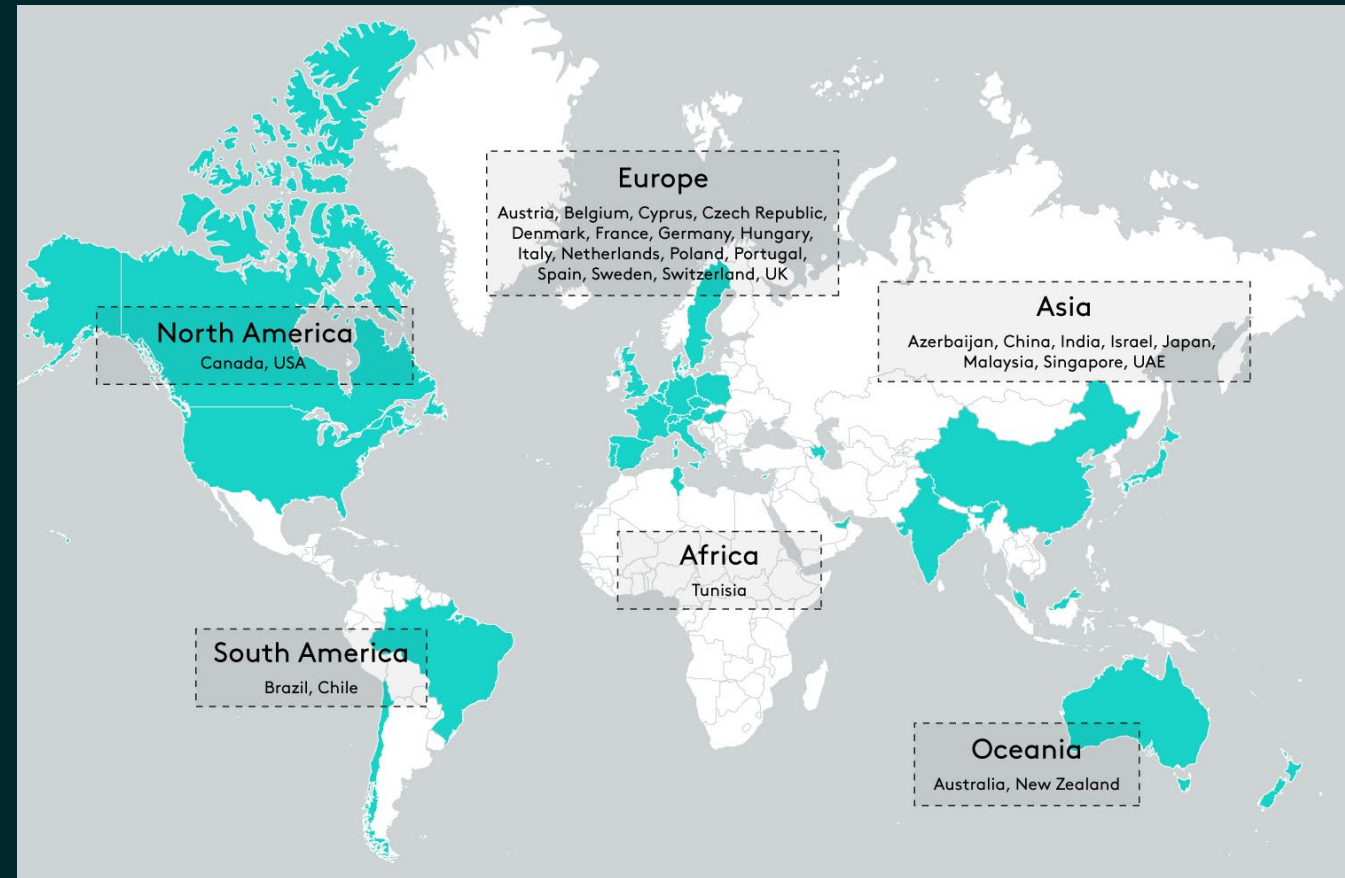


Figure 1: Distribution of Halma's production and office facilities as at 31 March 2026

Group-level control framework



Group-level Governance Framework

Board and executive level

Halma is the parent company of the Group, and the Group Executive Board sets the framework under which our businesses operate. The Group Chief Executive, Marc Ronchetti, leads the modern slavery agenda for Halma and has ultimate responsibility for modern slavery policies, but is supported by various functions including Risk and Compliance, and Sustainability. The Board monitors reports raised through Halma's whistleblowing channels and the Audit Committee has responsibility for reviewing the adequacy and security of the Group's arrangements for employees and contractors to raise such concerns.

Group level

Our Risk & Compliance team has overall responsibility for managing and implementing the Group-wide whistleblowing policy and reporting mechanisms and ensuring that these are investigated and closed accordingly. In addition, the team manage Group wide compliance training, delivered through VinciWorks and have ownership of our Modern Slavery Policy, Human Rights and Labour Conditions Policy, and recently launched Supplier Code of Conduct. The Sustainability team are responsible for steering the Supply Chain Working Group, further information on this can be found on page nine.

Company level

We have an autonomous organisational structure with each Halma company operating as a separate legal entity with its own board of directors and clear lines of accountability. As the directors and officers of their companies, local management are empowered to lead their business and are responsible for their own supply chains. Local management are tasked with implementing relevant modern slavery policies and any suspected violations are investigated in line with our Investigation Policy and an adequate response is implemented by the relevant company with support from Halma. Company level Modern Slavery Statements can be found in the appendix from page 19.



Risk Assessment & Due diligence



At a Group level, we conducted a number of activities during the year, in addition to our usual risk assessment exercises, to continue to evolve our approach, whilst identifying where gaps may exist. These activities have included:

High risk locations – Building on the risk assessment conducted during the year ended 31 March 2024, which identified potential risks, in relation to modern slavery within the workforce, and the practices and processes in place to mitigate these risks in companies deemed to be operating in medium to high-risk for modern slavery locations (as ranked by the Walk Free Global Index 2023), we conducted this assessment again for the year ended 31 March 2026 and expanded the scope to cover China, India and Israel (all deemed to be medium risk), in addition to Hungary, Dubai, Poland, Cyprus and Tunisia.

The assessment found that the companies operating within these locations have strong controls in place to prevent modern slavery in their own operations. In addition, only a minority of the companies identified used contracted labour, and where contracted labour was used, this was kept to a minimum and only reputable employment firms with policies aligned to Halma's policies were used.

A deeper dive of our Hub companies, operating in India and China, providing local legal, financial, HR and IT support to our companies operating in those regions, was also conducted and found that the operations of each Hub are considered to be low risk, in the context of modern slavery, and each have a degree of modern slavery controls already in place. Opportunities to evolve certain processes were identified and we will continue to work toward embedding improvements.

Given the outcome of the 2026 assessment, we are comfortable that there is minimal risk of modern slavery occurring within our Hubs and operations.

Supplier Code of Conduct – a newly created Supplier Code of Conduct was approved by the Board in September 2025, setting out minimum expectations aligned with global frameworks, and strengthening our Due Diligence process. This policy aligns with the spirit of our Code of Conduct of 'Just be a good person' and has been rolled out in a phased approach. See page 11 for further details.

Risk Assessment & Due diligence



Internal Audit review – During the financial year, our Internal Audit team conducted an audit of our Modern Slavery Statement. This review supported a planned refresh of our Human Rights policy and involved reviewing Group and company policy documents, testing the accuracy of disclosures, risk assessments and monitoring processes, and interviewing stakeholders to evaluate the robustness of controls and processes. The review confirmed that our disclosures are accurate and compliant and was helpful in highlighting minor opportunities for improvement, including a number of ‘quick wins’, which have already been addressed or are in the process of being addressed.

Supply Chain Working Group - Our Sustainability team formed a Supply Chain Working Group (SCWG) during the year, as part of their Sustainable Supply Chain Project, comprised of 10 companies, chosen by size and spread of locations. The aim of the working group is to develop policies, processes and tools to support supply chain due diligence. Key outcomes included development of the Supplier Code of Conduct and implementation of IntegrityNext, see below. The working group also received a Modern Slavery ‘masterclass’ from an external specialist.

Implementation of IntegrityNext – We transitioned to the IntegrityNext platform, a global sustainability and ESG compliance monitoring platform for supply chains, during the financial year ended 31 March 2026. We initially onboarded companies within the above mentioned SCWG, and the platform is freely accessible to all of our companies, offering them the opportunity to upload an unlimited number of suppliers.

Modern Slavery during the financial year ended 31 March 2026 - During the year ended 31 March 2026, a concern relating to potential modern slavery in our supply chain was reported via our whistleblowing hotline. An investigation is ongoing, and we are cooperating with the relevant supplier to address the matter in line with our policies and expectations. No other incidents, or suspected incidents, were reported or discovered within the Group during that period.

Policies and Procedures



Halma has a culture of openness, integrity and accountability. We require our employees to act fairly in their dealings with fellow employees, customers, suppliers and business partners. We are committed to preventing modern slavery and human trafficking in our operations and in our supply chains. The Group has a range of policies and procedures which mitigate the risk of modern slavery. Our Code of Conduct and Supplier Code of Conduct are both translated into several languages and policies are reviewed on a regular basis. All policies are made available on both our external website and our internal SharePoint site, accessible by all employees.

Code of Conduct

Our worldwide Code of Conduct (Code) sets out the ethical standards that govern the activities of the Group, our employees, and business partners. The Code includes a specific provision concerning the prevention of modern slavery and human trafficking, setting out:

- our clear commitment to never tolerate, or engage with those who enable modern slavery, human trafficking, and other abuses of labour rights; and
- an explanation of how modern slavery prevention falls within the remit of our Human Rights and Labour Conditions Policy.

The Code is available on our [website](#). It is a Group-wide requirement that all new employees receive, and sign to acknowledge that they have read the Code.

Supplier Code of Conduct

We launched our Supplier Code of Conduct (Supplier Code) during the financial year, which has been rolled out on a phased and risk-based approach, prioritising the highest risk and largest suppliers of our mature companies first.

The Supplier Code is aligned to our Code of Conduct and reflects our core values of 'Just be a good person'. The Supplier Code sets out the minimum legal, ethical, social and environmental standards expected of suppliers and business partners, including the prohibition of forced labour, child labour and human trafficking, as well as fair working conditions and safe workplaces. The Supplier Code sets expectations for ethical business conduct, environmental responsibility and supply chain due diligence. Suppliers are required to maintain appropriate controls, support audits, report breaches and take corrective action, and are encouraged to cascade their standards within their own supply chains. The Supplier Code is available on our [website](#).

Human Rights and Labour Conditions Policy (including Modern Slavery policy)

During the year, we reviewed our Human Rights and Labour Conditions policy, which has absorbed our existing Modern Slavery policy, to provide one consolidated and streamlined document.

Halma's Human Rights and Labour Conditions policy sets out its commitments to respect internationally recognised human rights across its operations and supply chains, in line with the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The Group is working towards implementing the UN Guiding Principles on Business and Human Rights by embedding risk-based human rights due diligence into its business practices

This policy applies to all Group companies and to suppliers and business partners.

Key commitments include:

- Prohibiting forced labour and human trafficking, including bans on recruitment fees, retention of identity documents and restrictions on worker movement
- Eliminating child labour and protecting young workers from hazardous work
- Respecting freedom of association and collective bargaining, including alternative mechanisms where these rights are restricted
- Ensuring non-discrimination, fair treatment and safe working conditions, including access to adequate facilities and accommodation where provided
- Complying with applicable wage and working time laws

The Policy states that Halma supports its operating companies to implement risk-based human rights and modern slavery due diligence, aligned with OECD Guidelines, to identify, prevent, mitigate and, where appropriate, remediate adverse impacts in operations and supply chains. All companies are expected to conduct due diligence on third parties and report potential violations.

Our Human Rights and Labour Conditions Policy can be found [here](#).

Policies and Procedures



Whistleblowing Policy

The Group has a whistleblowing policy and an established third-party whistleblowing service, accessible both online and by telephone, which allows employees in any of our businesses to raise concerns in confidence, anonymously (where permitted by law) and independent of their company. Our third-party whistleblowing hotline is not limited to employees and can be used by anyone, including our customers and suppliers.

In order to ensure that the mechanism remains accessible and trusted by our employees, the whistleblowing policy explains how the process works, how anonymity will be preserved, and provides assurance that the Group does not tolerate the victimisation or detrimental treatment of anyone that raises a concern in good faith and that the whistleblower will be protected against retaliation.

Halma's Board (and Audit Committee, where concerns relate to potential financial misconduct or fraud) reviews the nature of reports made through the whistleblowing channel in order to ensure that it remains an effective mechanism for raising concerns, that such reports are properly investigated under the direction of the Director of Risk and Compliance, in line with Halma Investigation Policy, and that there are no recurring trends that would suggest underlying cultural or ethical issues in the Group. During the year, all reported whistleblowing concerns were investigated and addressed appropriately, with most cases concerning employee relations, standards of conduct and workplace behaviour. Additionally, our whistleblowing process and reporting line channels are assessed annually, with findings reported to the Audit Committee. The FY26 annual review showed the process and reporting channels work effectively and no concerns were raised. During the year ended 31 March 2026, there was one case of suspected modern slavery reported via our whistleblowing channel, as detailed on page 10.

Our Whistleblowing Policy and contact details can be found [here](#).

Training



As part of Halma's commitment to provide Group-wide education on Modern Slavery, Halma provides ongoing online modern slavery training in partnership with VinciWorks.

During the financial year ended 31 March 2026, we refreshed our Modern Slavery training modules, which were then rolled out to all individuals who had taken Modern Slavery training prior to the year ended 31 March 2025.

To date, over 9,466 learners have completed modern slavery training modules via VinciWorks. Modern Slavery training modules are mandatory for senior management, subsidiary board directors and other key business personnel.

In addition to our Group-wide online training platform, we have facilitated a Modern Slavery 'masterclass' delivered by an external specialist to each of our companies reporting on Modern Slavery during the year, and those close to the reporting threshold, and plan to run this training again during FY27.

Other Group-level controls

Internal control certifications

All businesses are required to complete an annual internal control certificate which confirms that they have complied with key areas of control and compliance mandated by Group's policies and procedures (see Policies and Procedure section for more information). This certificate includes a specific provision confirming that all employees have read and signed our Code of Conduct which communicates our approach to critical human rights, business conduct and ethical matters, including modern slavery.

Halma supplier Terms and Conditions

Our UK businesses are asked to incorporate specific clauses on compliance with anti-slavery laws in their standard sale and distribution terms and conditions. These terms also require that distributors do not engage in any modern slavery practice.

During this financial year Halma's legal team undertook a full review of all supplier agreement terms and conditions, which resulted in a reduction in more than half of all documents, and streamlined all remaining documents. The revised documents have been rolled out during the year to our companies.



Company- level control framework



Company-level control framework



Companies are required to implement and comply with the Group-level control framework. We have in place a detailed guidance note to raise awareness of the Modern Slavery Act and the issue of modern slavery in the business and supply chain which is available to all our companies. Each company is responsible for their own supply and operation chains and is required to consider the potential issue of modern slavery and human trafficking within their business and supply chain and implement the relevant anti-slavery policies.

Whilst companies take varying approaches to assessing and mitigating risk in their supply and operation chains, in line with our decentralised operating model, the statements provided by our companies within the appendix demonstrate that each of these companies conducts initial and ongoing risk assessments and has due diligence processes in place. These activities may include, but are not limited to, issuing supplier questionnaires, incorporating specific clauses within their supplier and employment terms and conditions, producing supplier codes of conduct, conducting regular site visits and audits, salary benchmarking and, where temporary labour is used, using reputable employment firms and conducting appropriate due diligence checks.

Further information on modern slavery risk assessment, due diligence and mitigation can be found in the individual company statements, within the appendix.

Appendix

Individual company statements on modern slavery for the year ended 31 March 2026



Advanced Electronics Limited (Advanced) Designs and manufactures specialist fire safety systems.

Advanced is dedicated to upholding human rights and eradicating modern slavery. A crucial element of this commitment is to ensure responsible purchasing practices. We continue to meticulously evaluate all new supplier relationships before entering into agreements, utilising procedures such as supplier questionnaires and audits. Additionally, we conduct regular assessments of our existing suppliers to ensure compliance with our standards. These assessments include biennial audits, depending on the supplier's nature, and quarterly reviews. Physical audits are conducted when a supplier is identified as a potential high risk. We maintain a supplier risk matrix and have contingency plans in place to disengage from suppliers found to be involved in modern slavery.

We continuously strive to enhance our controls and processes through regular reviews of policies, agreements, audit procedures, and evaluations. With compliance to ISO 20400 now in place, which emphasises combating modern slavery in two of its seven main principles, we will continue to operate within this framework. We also aim to strengthen our purchasing contracts by incorporating additional modern slavery clauses.



Alicat Scientific Inc. (Alicat) Designs and manufactures flow and pressure devices

Alicat Scientific is committed to respecting human rights and preventing modern slavery within our organization, with our customers and with our suppliers. The following items are in addition to the Halma policies, code of conduct, Astute training, and required internal control certificates. The biggest exposure would be in our supply chain. The supply chain has been reviewed to identify potential risk areas keeping in mind what locations are in high-risk countries as identified by the Global Slavery Index. We have long-standing suppliers with great reputation who are vetted by ISO procedures, questionnaires, or info within our Halma network. For new suppliers, we prefer to do in-person audits and visits, so we can see with our own eyes the operations of the potential vendor and see any potential causes of concern. We have not identified high risks with our current suppliers. The lack of certifications in the first place will almost automatically disqualify a potential vendor, so a lot of the risk is mitigated there.



Ampac Pty Limited (Ampac) – Marketing, assembly and distribution of fire detection and alarm systems

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 (the Act) and sets out the steps taken by the Ampac Group of Companies (the Group) during the financial year ended 31 March 2026 to prevent modern slavery and human trafficking in its operations and supply chains. This statement is intended for inclusion in the Group’s statutory financial statements and for standalone publication.

The Group operates as part of Halma plc, a UK listed group of life saving technology companies, and aligns its approach to modern slavery with Halma’s values, ethical standards and group level governance framework.

Introduction

The Group is committed to conducting its business ethically, transparently and with integrity, and to preventing modern slavery and human trafficking in all its operations and supply chains. We recognise that modern slavery is a global and complex issue that can occur across industries and geographies, and that vigilance, robust governance and continuous improvement are essential.

Our approach is aligned with Halma’s Code of Conduct, Human Rights and Labour Conditions Policy and Modern Slavery Act Policy, and reflects the Group’s broader commitment to responsible business practices and sustainable value creation.

Organisational Structure and Operations

The Group comprises nine legal entities operating across Australia, New Zealand, the United Kingdom, Europe and selected other jurisdictions. The Group’s principal activities are the design, manufacture and distribution of intelligent fire detection, evacuation, emergency lighting and related safety technologies, together with associated software and support services.

Operations include a combination of manufacturing, assembly, distribution and service activities. Manufacturing and assembly are primarily undertaken in Australia, Belgium and Portugal, with sales and distribution operations in additional jurisdictions. The Group employs a predominantly permanent workforce, with limited use of temporary or contract labour in specific roles or peak periods.

The Group operates within Halma’s decentralised operating model. Each entity is responsible for managing its own operations and supply chains within the parameters of Halma’s group level policies and control framework, with oversight provided through internal control certifications and board governance.

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Supply Chains

The Group's supply chains support manufacturing, distribution and service activities and include the procurement of:

- Electronic components and printed circuit boards
- Specialist fire and safety devices and sub assemblies
- Plastic mouldings and mechanical components
- Software and IT services
- Logistics, warehousing and freight services
- Professional services and facilities related services

Suppliers are primarily located in Australia, the United Kingdom, Europe and New Zealand, with more limited sourcing from other regions. While the Group predominantly operates in jurisdictions generally assessed as lower risk for modern slavery, we recognise that certain supply chain characteristics may elevate risk, including:

- Electronics and component manufacturing
- Labour intensive manufacturing processes
- Multi tiered global supply chains
- Use of third-party logistics and labour providers

At present, supply chain visibility is strongest at Tier 1 supplier level. Visibility beyond Tier 1 remains limited in parts of the Group and is recognised as an area for further development.

Training and Awareness

Modern slavery awareness forms part of the Group's broader compliance and ethics training programme. Halma provides group wide online training modules covering modern slavery risks, indicators and reporting obligations, with targeted training for senior leaders, board members and procurement related roles.

Not all employees across the Group have completed role specific modern slavery training to date. Expanding training coverage and tailoring content to operational and procurement roles is a key focus area.

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Policies in Relation to Modern Slavery

The Group's approach to modern slavery is underpinned by Halma's group level policies, which apply to all Group entities, including:

- Code of Conduct
- Human Rights and Labour Conditions Policy
- Modern Slavery Act Policy
- Whistleblowing Policy

These policies set clear expectations for ethical behaviour, prohibit forced labour, child labour and human trafficking, and support the protection of fundamental human rights. Employees are required to read and acknowledge the Code of Conduct, and suppliers are expected to comply with applicable anti slavery and human rights requirements.

Where implemented locally, supplier terms and conditions include clauses requiring compliance with modern slavery legislation. The Group recognises that the application of standardised contractual protections is not yet fully consistent across all entities and is working towards greater harmonisation.

Risk Assessment and Due Diligence

Modern slavery risk is assessed as part of the Group's broader risk management framework, informed by Halma's group level guidance and tools. Risk considerations include geography, industry sector, labour intensity and supply chain complexity.

Current due diligence practices across the Group include, to varying degrees:

- Screening of suppliers at onboarding
- Use of third party compliance and screening tools
- Supplier questionnaires and declarations
- Ad hoc reviews of supplier practices

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In some entities, formalised and documented modern slavery risk assessments and supplier reviews are still developing. Where data or documentation is incomplete, the Group applies professional judgement and adopts a cautious, risk based approach. No confirmed incidents of modern slavery were identified within the Group's operations or Tier 1 supply chains during FY26.

Effectiveness and Key Performance Indicators

The Group's effectiveness in addressing modern slavery is currently monitored primarily through qualitative measures, including:

- Completion of Code of Conduct acknowledgements
- Completion of relevant compliance training
- Use of whistleblowing and speak up mechanisms
- Supplier screening and review activities

Quantitative KPIs are not yet consistently defined or tracked across all entities. The Group recognises this limitation and intends to introduce more consistent and measurable indicators over time, proportionate to the scale and risk profile of each entity.

Future Actions and Continuous Improvement

The Group recognises that its approach to modern slavery is evolving. Key priorities for the coming year include:

- Improving consistency in supplier onboarding and contractual modern slavery protections
- Enhancing documentation and cadence of supplier risk assessments
- Increasing visibility beyond Tier 1 suppliers where proportionate and practicable
- Introducing clearer governance ownership at entity level
- Developing meaningful KPIs to monitor effectiveness
- Expanding and embedding modern slavery training and awareness

These actions are intended to strengthen controls, improve transparency and support continuous improvement, while remaining realistic and proportionate to the Group's size and risk profile.



Apollo Fire Detectors Limited (Apollo UK) Designs and manufactures fire detection solutions for commercial and industrial applications

Introduction

Apollo Fire Detectors Limited (“Apollo”) supports the provisions set out in the Modern Slavery Act 2015 and has taken steps to prevent modern slavery occurring in its supply chain and within its own operations.

This statement is published in accordance with section 54 of the Act and relates to the financial year ending 2026. This will be reviewed every financial year.

Business Structure

Apollo designs and manufactures fire detection products for commercial and industrial applications. The business primarily manufactures in the United Kingdom, where its main operational and manufacturing activities are based.

Apollo operates in global markets and supplies products internationally. In support of its operations, the company works with a global supply chain, sourcing components, materials and services from suppliers in multiple countries. This international footprint reflects the nature of Apollo’s products and customer base.

Apollo employs over 600 permanent and temporary employees. The majority of employees are located in the UK, with additional international representation in China, the United States, Germany and Vietnam, primarily to support customer partnerships and engagement.

Apollo Fire Detectors Limited is a subsidiary of Halma plc, a global group of life-saving technology companies. As part of the Halma group, Apollo aligns its governance, sustainability and ethical standards with group-wide expectations and applicable legal requirements.

Apollo does not tolerate modern slavery or human trafficking and is committed to acting ethically and with integrity in all business relationships.

Supply Chain Structure, Products, and Sourcing

Apollo Fire Detectors Limited operates a robust and diverse supply chain supporting the design and manufacture of fire detection products for commercial and industrial use. The business primarily operates within the UK, but sources components, materials, and services globally to ensure the highest standards of quality and reliability.

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The company's main categories of spend within its supply chain are as follows:

- **Electronic Components:** This represents the largest area of expenditure. Apollo sources electronic components predominantly from large multinational distributors or directly from manufacturers with production facilities spanning multiple countries worldwide.
- **Factored Goods:** Suppliers in this category are mainly based in the UK and Europe, with some operations in Australia. These suppliers typically have supply chains similar to Apollo's, involving mouldings and electronic components.
- **Mouldings:** The majority of injection moulding spend is in the UK, with additional sourcing from China and the Far East. Approximately 70% of raw plastic materials are purchased directly from Germany, while the remainder is acquired by moulders through distributors in Europe and the Far East.
- **Finished Goods Subcontracting:** Finished products are manufactured on Apollo's behalf by three main subcontractors: one in the UK (Cranford), one in Malaysia, and one in China (Apollo Beijing).
- **Printed Circuit Boards (PCBs):** All PCBs are sourced through a distributor, NCAB, and are manufactured in China, with stock held in the UK.
- **Metalwork:** While some suppliers are based in the UK, the majority of metalwork spend is direct or indirect from the Far East.
- **Packaging & Labels, Hardware & Consumables:** These items are primarily sourced from UK-based manufacturers, who in turn source materials from the UK, Europe, and the Far East.

Indirect spend, which covers goods and services outside the main categories, is not currently mapped in detail. During 2026, Apollo plans to hire an Indirect Buyer to increase capability and improve oversight in this area. In addition, Apollo is implementing a New Supplier Checklist to capture and assess risk for new suppliers being onboarded for indirect goods and services. Larger and ongoing indirect spend will also be subject to further review and consideration.

Apollo's supply chain spans the UK, Europe, China, the Far East, Malaysia, Germany, and Australia, reflecting the company's commitment to sourcing quality materials and components internationally while upholding ethical standards and compliance with the Modern Slavery Act 2015.

Apollo maintains a robust supply chain mapping process, focusing primarily on Tier 1 suppliers. Mapping is conducted by category of spend and targets the top 80% of expenditure, enabling prioritisation of high-risk areas. Category Plans are utilised to document supplier engagement and risk assessments, while supplier self-assessments and periodic audits provide further insight into compliance and ethical standards.

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Efforts to map below Tier 1 involve gathering manufacturer specification details and using platforms such as Z2data to improve visibility. This ongoing process aims to identify potential risks deeper within the supply chain, although full transparency remains challenging due to resource constraints.

Contingency plans are in place to respond to instances or risks of modern slavery or human trafficking. These include immediate risk-mitigation actions, technical sourcing alternatives, enhanced due diligence, and escalation procedures as required. Regular business relationship reviews and scheduled audits ensure compliance with Apollo's Supplier Code of Conduct and ethical sourcing policies.

Contractual terms are strengthened by the inclusion of ESG clauses and references to the Supplier Handbook, reinforcing expectations for ethical conduct. Apollo acknowledges that supply chain visibility below Tier 1 is limited by current resources, and continues to address these gaps through targeted mapping and ongoing supplier engagement.

Governance, accountability and enforcement

Modern slavery compliance is managed by the Apollo Sustainability steering group that consist of the Business Directors with input from Supply Chain, HR. Apollo also aligns with Halma Group governance and working groups on sustainability and human rights. Suppliers are informed of all policies through the Supplier Code of Conduct and Handbook.

Audits related to modern slavery are currently limited in scope, with questions focused primarily on general sustainability and modern slavery policies and procedures. If a supplier possesses EcoVadis registration, this is accepted as part of compliance; otherwise, the audit process relies on supplier-provided information regarding relevant policies. Currently, we do not conduct direct assessments or apply risk ratings specifically for modern slavery. For the purposes of our policy, a 'high-risk supplier' is defined in relation to modern slavery based on factors such as geographic location, sector, and the nature of operations, although explicit risk evaluation is not performed during audits.

Human Rights Diligence

Apollo's human rights due diligence approach is embedded in its existing governance, procurement, HR, and supply chain policies. Apollo maintains policies that address human rights and modern slavery, including its Modern Slavery Act Policy, Supplier Code of Conduct, Ethical Sourcing Policy, and relevant Halma Group policies. Risk is assessed through category planning, supplier self-assessments, audits, and the use of third-party risk tools, with enhanced focus on higher-risk categories and geographies.

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Apollo has not identified any violations or indicators of modern slavery or human trafficking within its operations or supply chain during the financial year ending 2026.

Temporary and contracted labour

Apollo primarily employs temporary labour in its manufacturing operations. Temporary staff account for 22.9% of the workforce, while permanent employees comprise 77.1%. Recruitment of temporary labour is managed through approved agencies who are expected to comply with legal and ethical standards.

Policies and Procedures

- Apollo, along with our parent company Halma, has policies and procedures in place which support the prevention of modern slavery, including:
- Apollo Modern Slavery Act Policy
- Halma Code of Conduct, which includes Human Rights
- Halma Whistleblowing Policy
- Apollo Supplier Code of Conduct
- Apollo Ethical Sourcing Policy

Additionally, we take further steps to mitigate the risk of modern slavery, including:

- We are dedicated to guaranteeing fair and competitive compensation for all staff members.
- Mandatory Modern Slavery training is provided to relevant employees.

Code of Conduct

Halma's Code of Conduct sets out the ethical standards that govern the activities of the business, employees and business partners. It includes a clear commitment to preventing modern slavery and human trafficking and requires all employees to acknowledge and comply with its provisions.

Apollo is committed to respecting fundamental human rights and labour standards, including:

- prohibiting forced, bonded or compulsory labour;
- prohibiting child labour;
- ensuring employees are free to leave employment; and
- respecting the right to freedom of association.

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Actions in FY27 and Beyond

Apollo will continue to strengthen its modern slavery and wider ESG approach through enhanced supplier engagement, assurance, and collaboration. During 2026, Supply Chain will actively promote the Halma Sustainability Programme with suppliers, with a focus on key priority areas including human rights and labour standards, health and safety, environmental protection, and carbon management. Furthermore, we will make it more transparent for suppliers to whistleblowing, ensuring they are fully aware of reporting channels and processes, and encouraging openness around potential concerns or breaches.

Supply Chain and Supplier Quality will review the current supplier audit programme to assess how more complex ESG topics can be incorporated in a proportionate, efficient, and cost-effective manner, with the aim of improving ongoing monitoring and due diligence. Apollo will continue its active involvement in the Halma Sustainability Supply Chain Working Group and associated training and workshops, including sessions focused on supply chain risk and modern slavery. Continued participation will support capability building and enable greater collaboration across Halma operating companies, including shared learning, joint risk mitigation, and potential use of pooled audit resources. Apollo is also developing their use of an ESG platform to further strengthen transparency, data collection, and supplier engagement.



Avo Photonics

Avo Photonics, Inc (Avo Photonics) *Designs, develops and manufactures private label photonics*

Avo Photonics does not tolerate the use of child labour, forced labour, or human trafficking in any form—including slave labour, prison labour, indentured servitude, or bonded labour—in our operations or value chain.

Prior to partnering with a supplier, Avo Photonics evaluates the risk of modern slavery based upon the supplier's location, the type of commodity being purchased, and the supplier's commitment to prevention of modern slavery. Avo Photonics current supplier database does not include any that reside in high-risk countries as identified by the Global Slavery Index. Avo Photonics' purchasing terms and conditions require that suppliers comply with all laws concerning slavery and human trafficking.



Bureau d'Electronique Appliquée S.A. (BEA) Designs and manufactures motion, presence and safety sensors.

Before entering into any business relationship with BEA, all potential suppliers undergo an audit. Compliance with the UK Modern Slavery Act is a key criterion in approving new suppliers. In addition, BEA's purchasing terms and conditions—available in English, French, and Chinese on the BEA website—include specific requirements for all suppliers to adhere to the UK Modern Slavery Act. A link to these terms and conditions is included in every BEA purchase order.

BEA previously rolled out a BEA Supplier Code of Conduct to suppliers outlining the standards suppliers must meet, including the avoidance of forced labour and child labour, non-discrimination, fair treatment, freedom of association and collective bargaining, as well as requirements regarding working hours, wages, and other employment conditions.

As part of the Halma Sustainability Supply Chain Working Group, BEA will transition to Halma Supplier Code of Conduct and will communicate it to suppliers through the deployment of the Integrity Next platform. This will drive more alignment for suppliers working with multiple Opco's while securing a formal approval from suppliers through the platform.

For existing suppliers, BEA's Quality and Purchasing teams conduct regular audits to assess working conditions, workplace environment, worker safety, and labour practices.



CenTrak, Inc. (CenTrak) *Designs and manufactures real-time location services for healthcare facilities.*

CenTrak, Inc. is a mid-sized healthcare technology company operating in the healthcare IT and medical technology sector. The company employs approximately 250–500 people in support of its products and services. CenTrak, Inc. is primarily based in the United States and operates as a wholly owned subsidiary within the Halma plc healthcare sector, supporting customers through internal teams and third-party suppliers.

CenTrak provides real-time location systems (RTLS) for healthcare environments, including hardware devices, supporting software platforms, and related professional services. These solutions are used by hospitals and healthcare systems to improve operational efficiency, patient safety, and staff workflows. Hardware manufacturing is solely outsourced to 3rd party contract manufacturers, including at least one manufacturer located in China. Sourcing activities are handled through both third-party contract manufacturers and internal resources. Finished good products are distributed either directly to healthcare customers or via intermediate distributors through CenTrak's Newtown, Pennsylvania warehouse facility.

CenTrak maps its Tier 1 suppliers through supplier onboarding questionnaires, contractual agreements, supplier scorecards, and quality-led reviews, aligned with Halma Group modern slavery policies and supplier governance frameworks. CenTrak's mapping approach beyond Tier 1 is risk-based and proportionate. CenTrak participates in Group-led initiatives intended to improve downstream supply chain transparency over time, especially for higher-risk suppliers and regions. CenTrak has clear visibility of its Tier 1 suppliers; however, mapping beyond Tier 1 depends on risk identified and is not currently conducted on a systematic basis, with downstream information obtained through Tier 1 supplier requirements where appropriate.

CenTrak regularly reviews its business relationships, including from a modern slavery and human trafficking perspective and has in place contingency plans and responsible exit strategies where a supplier or business partner has been found to be involved in modern slavery or human trafficking. We use standard modern slavery terms and conditions in all supplier contracts.

Less than 10% of CenTrak's workforce is outsourced (excluding manufacturing) and has in place documented procedures to be followed in respect of recruiting temporary/contracted labour.

Overall accountability for reviewing compliance with modern slavery-related policies and managing modern slavery risks sits with CenTrak senior leadership. Operational responsibility for identifying, investigating, and managing modern slavery risks within the business and supply chain is led by CenTrak's Supply Chain and Quality functions, with escalation to senior leadership as required.

Centrak continued from previous page...

Centrak has in place processes to integrate the Group Modern Slavery and Human Rights Policies into its business and contractual processes. We follow the Employer Pays principle in practice; however, it is not currently documented within our US office recruitment policy. In addition to Group-level policies, we also have in place company level policies to help tackle modern slavery. Within the organisation, modern slavery and human rights policies are communicated through group-issued policies, mandatory Halma training (via Astute), and leadership oversight that reinforces expectations and accountability. For suppliers and subcontractors, policies are communicated and enforced through supplier onboarding and contractual mechanisms, including completion of modern slavery and human trafficking questionnaires, with compliance monitored through Quality-led oversight and supplier reviews.

Centrak has in place robust risk management and controls processes in relation to identifying, monitoring and evaluating modern slavery and human trafficking. During the financial year ended 31 March 2026, no high risks been identified during the risk assessment process, nor have any high-risk suppliers or high-risk areas been identified.

CenTrak conducts risk assessments at supplier onboarding through due-diligence questionnaires, performs sanctions screening on vendors every six months, and undertakes additional risk-based reviews where specific concerns are identified. During the year, a cross-functional team with representation from Operations, Supply Chain, Engineering, and Quality conducted a site audit of our largest supplier. The team visited manufacturing sites in China and Vietnam, participated in a business review, and conducted a walkthrough of the factory floor, during which no high-risk areas were identified. CenTrak mitigates modern slavery risks through leadership oversight, mandatory Halma training, supplier onboarding questionnaires, contractual requirements aligned to the Halma Supplier Code of Conduct, and sanctions screening, with additional actions taken on a risk-based basis.

CenTrak's human rights due-diligence approach aligns with Halma Group policies and includes leadership oversight, mandatory modern slavery training, supplier onboarding questionnaires, contractual alignment with the Halma Supplier Code of Conduct, six-monthly sanctions screening, and ongoing Quality-led supplier monitoring with risk-based escalation. CenTrak has risk-based remediation mechanisms in place, including supplier engagement, corrective action planning, contractual remedies, and Group escalation channels, and no substantiated incidents of modern slavery have been identified to date.

Over the next 12 months and beyond, CenTrak's focus will be on strengthening risk-based supplier monitoring, conducting targeted site visits or audits where risk indicators warrant, and continuing alignment with Halma Group policies and supplier awareness initiatives.



Crowcon Detection Instruments Limited (Crowcon) *Designs and manufactures gas detection instruments.*

Crowcon conducts a preliminary modern slavery risk assessment on all its new suppliers. This risk assessment is based upon geography, the commodity being purchased and the nature of the transaction.

Crowcon performs onsite quality assessments, or where geographical restrictions apply, a quality audit questionnaire is completed by all Tier 1 suppliers which includes the Modern Slavery section and code of conduct. As part of Crowcon's commitment to its sustainability strategy, the top 10 suppliers by spend will also be asked to complete the Integrity Next Modern Slavery assessment.

Crowcon refreshes the quality audits and agreements with its suppliers on an on-going basis. The Crowcon board and relevant employees have undertaken Halma's Modern Slavery Act compliance training. We have not identified any violations or indicators of modern slavery or human trafficking.



European Safety Systems Limited (ESSL) Develops and manufactures high performance notification, initiation and detection devices primarily used in highly hazardous environments in heavy industries and complex manufacturing.

was acquired by Halma in December 2025 and operates within Halma's Safety Sector. As a recently acquired company, ESSL is in the process of being integrated into Halma's group-level control frameworks.

ESSL is headquartered in London, UK, with operations in the US and France. ESSL has an established Anti-Slavery and Human Trafficking Policy, which sets out a zero-tolerance approach to modern slavery across its operations and supply chains. The policy applies to all persons working for or on behalf of ESSL, including employees, directors, officers, agency workers, contractors and suppliers. Key elements of the policy include:

- A commitment to implementing systems and controls to ensure modern slavery is not taking place within its organisation or supply chains;
- A risk-based approach to contracting processes, including the assessment of whether specific anti-slavery prohibitions should be included in third-party contracts;
- Requirements for employment and recruitment agencies to confirm their compliance with the policy; and
- Consideration of supplier audits as part of ongoing risk assessment and due diligence.

Since joining Halma, ESSL has begun aligning with the Group's modern slavery control framework as part of a wider integration. As part of their integration ESSL will:

- Enrol senior management and key personnel on Halma's VinciWorks online modern slavery training;
- Issue and obtain employee sign-off on Halma's Code of Conduct;
- Complete Halma's annual internal control certification process;
- Review and align its existing anti-slavery policy with relevant Halma group level policies.

FORTRESS

Fortress Interlocks Limited (Fortress) Fortress designs and manufactures safety equipment, protecting lives in hazardous workplaces.

Fortress and its parent company, Halma plc, fully support the provisions set out in the Modern Slavery Act (MSA) 2015.

This policy applies to all persons working for or on behalf of Fortress, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

Tackling modern slavery requires everyone to play a part and remain vigilant to the risk in all aspect of the Fortress business and business relationships.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development; and
- All forms of modern slavery which involve, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspect of the Fortress business and business relationships.

Fortress carries out 'on-boarding' audits and regular self-assessments on all suppliers. As part of this process, Fortress assesses its suppliers on a variety of risk factors including location of operations, sub-supply assessment, supplier policy and document control assessments and where necessary, will carry out on-site audits.

If child labour is found, *Fortress Remediation policy* will apply. This includes removing the child from the labour situation and providing support for their education and rehabilitation. The goal is to ensure that the child is not left in a worse situation.

HWM-Water Ltd (HWM) Designs and manufactures monitoring and telemetry equipment for water, wastewater and gas networks.

HWM Global are firmly committed to supporting the provisions set out by the Modern Slavery Act 2015. We strive to create a culture of openness, integrity and accountability. All employees are required to adhere to the Halma Code of Conduct and act fairly in all dealings.

To combat modern slavery in our operations, we have robust documentation and training and operate under a set of comprehensive group policies and procedures. These are made accessible to all staff through a broad 'Staff Handbook' that outlines the standards and processes we expect our team to follow. Training is delivered regularly with refresher mini updates to keep staff engaged and alert to recognising the signs of modern slavery, human trafficking or abuse in the workplace. We are committed to supporting good mental and physical health in our workforce through our employee value proposition. We encourage our colleagues to speak up and report concerns via the escalation procedure, reinforced by the Halma Whistleblowing Scheme, providing a formal and independent reporting channel. All Complaints are dealt with promptly.

In addition to internal processes, we require our suppliers to acknowledge and conform to the Modern Slavery Act by signing our supplier questionnaire and code of conduct. We expect our tier 1 suppliers to confirm ongoing monitoring and adherence to the Act. These standards are extended to on-site contractors and visitors and endorsed by their HWM Global Champion.

We confirm we have had no reports of modern slavery, human trafficking or labour conditions violations in the last year.

Whilst we may not operate in high-risk industries or countries, according to the Global Slavery Index 2023, we recognise there is always room for improvement. Over the next 12 months, HWM Global will continue to undertake additional due diligence across our supply chain and with our operating partners. Our supply chain are subject to an audit review process, starting with our top spend suppliers, to identify potential risks, including modern slavery. We aim to build a strong, educated and supportive value chain, with full transparency.

The use of temporary and agency workers is limited and is typically less than 10% of the total workforce in the UK headquarters, however, we contract through a large and reputable employment agency that fully recognises and adheres to the provisions of the Act.



Keeler Limited (Keeler) Designs, manufactures and distributes equipment and solutions for the eye care industry.

Accutome Inc (Accutome) Designs, manufactures and distributes equipment and solutions for the eye care industry.

(combined statement as part of the same group of operating companies)

1. Overview

This statement explains the steps Keeler has taken to prevent modern slavery and human trafficking in its business and supply chain.

Keeler operates a global business with supply chains spanning Europe, the Americas and Asia. We are committed to conducting business ethically and maintaining robust controls to mitigate the risk of modern slavery. This commitment is embedded in our procurement, supplier onboarding, and governance processes and is aligned with the broader framework established by Halma plc.

2. Risk Profile

Keeler considers the risk of modern slavery within its own operations to be low, given the skilled nature of its workforce and the regulated environment in which it operates. However, as with many global manufacturing businesses, exposure exists within the supply chain, particularly where suppliers operate across multiple geographies or rely on labour-intensive processes.

Risk levels vary across the supply base. Direct (Tier 1) suppliers are generally assessed as low- to moderate-risk depending on their location, maturity, and nature of operations. The extended supply chain presents a higher level of inherent risk due to reduced visibility beyond Tier 1 suppliers. Key risk drivers include geographic exposure, the use of subcontracted labour, and the sourcing of components from higher-risk regions.

3. Key Controls and Mitigations

During FY26, Keeler has strengthened its control environment through a combination of supplier onboarding, due diligence and monitoring activities. A key development has been the rollout of Halma's supply chain platform 'IntegrityNext', which supports a more structured and data-driven approach to supplier risk management.

Keeler and Acctuome continued from previous page...

As at the end of Keeler's current financial year, Keeler has onboarded 50 of its key suppliers onto the platform, representing approximately 80% of total supplier spend. Of these, around 80% have completed the required onboarding and compliance activities; we expect the remaining amount to be completed over the next two months. This approach ensures that focus is directed towards suppliers representing the greatest potential risk and impact.

As part of this onboarding process, suppliers are required to formally acknowledge and comply with the Halma Supplier Code of Conduct. This includes explicit commitments relating to the prohibition of forced and child labour, the provision of fair working conditions, and adherence to internationally recognised human rights standards.

Keeler applies a risk-based approach to due diligence, prioritising suppliers based on geographic exposure, industry risk and level of business influence. This approach aligns with Halma guidance to implement proportionate and practical controls rather than full value chain audits, ensuring resources are focused where they are most effective.

4. FY26 Actions and Effectiveness

Over the course of FY26, Keeler has undertaken a structured review of its supplier base to identify higher-risk geographies and categories. Modern slavery considerations have been more explicitly embedded in procurement processes, including supplier selection, onboarding, and ongoing management.

Alignment with the Halma Supplier Code of Conduct has been strengthened through both contractual and operational mechanisms, ensuring that expectations are clearly communicated and formally acknowledged. In parallel, internal awareness of modern slavery risks has been increased across procurement and operations teams through participation in Halma-led initiatives and working groups.

Based on the controls and monitoring in place, Keeler did not identify any instances of modern slavery within its operations or direct supply chain during FY26. In addition, no concerns were raised through whistleblowing or other reporting channels during the period.

Keeler and Acctuome continued from previous page...

5. Future Priorities (FY27)

Keeler will continue to enhance its approach to modern slavery risk management during FY27. A key priority will be the further rollout of IntegrityNext across the supplier base, with a continued focus on higher-risk suppliers and those representing significant spend.

In addition, Keeler will seek to improve visibility beyond Tier 1 suppliers by strengthening data collection and supplier engagement processes. This will include increased use of supplier questionnaires and targeted follow-up activities where risks are identified.

Further work will also be undertaken to enhance audit readiness and documentation, ensuring that all controls are clearly evidenced and aligned with evolving regulatory expectations and Halma Group standards.

Appendix – Supplier Due Diligence Framework

Keeler operates a structured and multi-layered supplier onboarding and due diligence process designed to mitigate modern slavery and broader supply chain risks.

All new suppliers are required to complete a formal onboarding process, including submission of a New Vendor Approval Form. This document captures key information relating to supplier identity, financial arrangements and internal approval controls, and includes confirmation that the supplier has completed and agreed to the relevant Code of Conduct requirements. If this is not completed then suppliers are not onboarded.

In addition, suppliers are required to complete a Supplier Quality Questionnaire, which assesses their operational and compliance capabilities. This includes confirmation of recognised quality standards, agreement to audit rights, and evidence of documented quality management and corrective action processes. Importantly, the questionnaire also requires suppliers to confirm that they support the principles of the Modern Slavery Act, international human rights standards and ILO conventions, and that these are upheld within their own supply chains.

These controls operate alongside the Halma Supplier Code of Conduct and the IntegrityNext platform, creating a combined framework of policy, process and monitoring. Together, these elements provide a robust and proportionate approach to identifying, managing and mitigating modern slavery risks across Keeler's supply chain.



Kirk Key Interlock Company, LLC (Kirk Key) – *designs and manufactures interlock safety components*

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Kirk Key to help prevent modern slavery and human trafficking within our operations and supply chains.

Kirk Key is committed to conducting business ethically, responsibly, and with respect for human rights. We do not tolerate forced labor, child labor, human trafficking, or any form of modern slavery in our business or in the partners and suppliers with whom we work.

Kirk Key is part of the Sentric Group which is part of Halma plc group of companies, and we align our approach to ethical conduct and human rights with Halma's group-wide standards and policies.

Our Business and Supply Chains

Our supply chain supports the manufacture of safety trapped Key interlocks and safety loading docks devices and includes suppliers of components, materials, sub-assemblies, logistics services, and professional services. While most of these suppliers are in the USA, some others may be located across multiple regions and jurisdictions.

All suppliers are subject to regular screening using the Visual Compliance tool to support risk identification and ongoing monitoring. To further strengthen our due diligence, site visits and audits will be introduced for suppliers located in higher-risk geographies starting in FY27. These audits are planned to be conducted on a one- to two-year cycle, based on risk.

Our purchasing terms and conditions require suppliers to comply with Halma's Modern Slavery policies, which are incorporated into our contractual arrangements.

Kirk Key continued from previous page...

Policies and Governance

Kirk Key operates under a framework of policies designed to promote ethical behaviour, legal compliance, and respect for human rights. This includes alignment with Halma Group policies such as:

- The Halma Code of Conduct, which sets expectations for ethical behaviour and explicitly prohibits forced labor, bonded labor, child labor, and human trafficking

- The Halma Human Rights and Labor Conditions Policy, which reflects internationally recognized human rights principles and labor standards

These policies apply to our employees and inform our expectations of suppliers and business partners.

Risk Assessment and Due Diligence

Kirk Key recognizes that modern slavery risks can exist in global supply chains and that risk levels may vary based on factors such as geography, industry, and supplier practices. In line with Halma Group's risk-based approach, Kirk Key considers modern slavery risks as part of our broader supply chain and compliance activities.

Training and Awareness

Kirk Key supports awareness of ethical business practices and modern slavery risks, particularly for employees involved in supply chain management and procurement. Through Halma Group resources and internal communications, relevant employees are encouraged to understand the indicators of modern slavery and to raise concerns if issues are identified.

Reporting and Speaking Up

Kirk Key employees have access to confidential reporting mechanisms, including whistleblowing channels provided through the Halma Group. These mechanisms allow concerns about unethical behaviour, legal non-compliance, or potential human rights issues to be raised without fear of retaliation, in accordance with applicable laws.

Ongoing Commitment

Kirk Key is committed to continuous improvement in how we identify, assess, and mitigate modern slavery and human trafficking risks. We operate within the Halma Group framework and work closely with our suppliers and partners to strengthen responsible sourcing practices and uphold high ethical standards across our value chain.

Kirk Key continued from previous page...

As part of our broader sustainable and responsible sourcing approach, we have increasingly aligned our manufacturing footprint with the markets we serve. Over recent years, this has included expanding onshored production in the United States, primarily within our own facilities. This approach supports more resilient supply chains, reduces complexity, and enables closer oversight and engagement with manufacturing activities and supplier practices.

Greater proximity between production, customers, and operations enhances our ability to maintain awareness of labour practices, reinforce ethical expectations, and respond effectively where improvements are needed.

In parallel, we continue to strengthen supplier engagement and governance. We have introduced a Modern Slavery Policy and Governance questionnaire for suppliers, supporting clearer expectations, improved transparency, and ongoing dialogue. This process will continue to be refined to ensure timely engagement and effective integration into our supplier due diligence activities.



Medicel AG (Medicel) Designs and manufactures specialist eye surgery instruments.

Medicel is committed to preventing modern slavery and ensuring compliance with the Modern Slavery Act. Our Supplier Quality Agreement mandates compliance, reinforced by a Labor Standard Assurance Questionnaire requiring due diligence on key risk factors such as migrant worker employment and worker representation.

All supplier agreements include modern slavery compliance clauses. As part of our quality assurance measures, Tier 1 suppliers are regularly audited to ensure compliance with our requirements of adherence to modern slavery standards. None of the audits conducted so far have identified any findings in this area, which aligns with our expectations.



Microsurgical Technology, Inc (MST) *Designs and manufactures surgical devices and instruments used to improve sight.*

Microsurgical Technology Inc. (MST) is dedicated to preventing modern slavery and human trafficking within our business operations and supply chains. We uphold high standards for our employees and suppliers to ensure compliance with the Modern Slavery Act 2015.

Operating in the ophthalmic surgical devices industry, MST has ~190 employees across five countries. Our supply chain relationships are primarily based in the US and Europe, with less than 5% presence in other regions.

We conduct due diligence on our suppliers to ensure they meet our standards, including:

1. Risk assessments
2. On-site audits
3. Supplier questionnaires

We ensure all employees complete company-wide training requirements to comply with the Modern Slavery Act. We foster a 'Speak Up' culture to encourage raising concerns through proper channels.

MST is committed to continuous improvement, enhancing our due diligence processes, training efforts, and best practices with our industry partners.

SUNTECH

SunTech Medical Inc (SunTech Medical) *Designs and produces blood pressure technologies and solutions.*

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by SunTech Medical to help prevent modern slavery and human trafficking within our operations and supply chains.

SunTech Medical is committed to conducting business ethically, responsibly, and with respect for human rights. We do not tolerate forced labor, child labor, human trafficking, or any form of modern slavery in our business or in the partners and suppliers with whom we work.

SunTech Medical is part of the Halma plc group of companies, and we align our approach to ethical conduct and human rights with Halma's group-wide standards and policies.

Our Business and Supply Chains

Our supply chain supports the development, manufacture, and distribution of medical devices and includes suppliers of components, materials, sub-assemblies, logistics services, and professional services. These suppliers may be located across multiple regions and jurisdictions. All suppliers are vetted regularly with the Visual Compliance tool. Site visits and audits are done routinely, every 1-2 years. Terms and conditions on our purchase orders require suppliers to attest to compliance with Halma's Modern Slavery policies.

Policies and Governance

SunTech Medical operates under a framework of policies designed to promote ethical behavior, legal compliance, and respect for human rights. This includes alignment with Halma Group policies such as:

- The Halma Code of Conduct, which sets expectations for ethical behavior and explicitly prohibits forced labor, bonded labor, child labor, and human trafficking

- The Halma Human Rights and Labor Conditions Policy, which reflects internationally recognized human rights principles and labor standards

These policies apply to our employees and inform our expectations of suppliers and business partners.

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Risk Assessment and Due Diligence

SunTech Medical recognizes that modern slavery risks can exist in global supply chains and that risk levels may vary based on factors such as geography, industry, and supplier practices.

In line with Halma Group's risk-based approach, SunTech Medical considers modern slavery risks as part of our broader supply chain and compliance activities. This includes evaluating supplier relationships, the nature of goods and services sourced, and the regions in which suppliers operate. Where appropriate, suppliers may be asked to confirm compliance with applicable labor laws and ethical standards.

Training and Awareness

SunTech Medical supports awareness of ethical business practices and modern slavery risks, particularly for employees involved in supply chain management, procurement, and external partnerships. Through Halma Group resources and internal communications, relevant employees are encouraged to understand the indicators of modern slavery and to raise concerns if issues are identified.

Reporting and Speaking Up

SunTech Medical employees have access to confidential reporting mechanisms, including whistleblowing channels provided through the Halma Group. These mechanisms allow concerns about unethical behavior, legal non-compliance, or potential human rights issues to be raised without fear of retaliation, in accordance with applicable laws.

Ongoing Commitment

SunTech Medical is committed to continuous improvement in how we identify, assess, and mitigate modern slavery risks. We will continue to work within the Halma Group framework and with our suppliers and partners to strengthen responsible sourcing practices and uphold high ethical standards.



Static Systems Group (SSG) *Global provider of critical alarms, integrated communication systems and software solutions*

SSG is committed to eliminating the risk of modern slavery and human trafficking across our operations and supply chains. We fully comply with the UK Modern Slavery Act 2015 and follow the Halma Modern Slavery Policy.

All suppliers must complete a due diligence process, including a modern slavery risk questionnaire covering policies, supply chain controls, and training. Suppliers are assessed annually, and high-risk suppliers are subject to audits.

Relevant employees complete mandatory compliance training, and modern slavery terms are embedded in our supplier contracts.

Our approach forms part of a broader commitment to responsible sourcing, ethical business conduct, and strong supply chain governance.