

ANNUAL STATEMENT FOR THE FINANCIAL YEAR ENDING 31ST DECEMBER 2024: SLAVERY AND HUMAN TRAFFICKING

This statement is made on behalf of Harworth Group plc and its subsidiaries in accordance with section 54(1) of the Modern Slavery Act 2015 (the **Act**) and constitutes our Modern Slavery statement for the financial year ending 31st December 2024. A full list of the entities covered by this statement can be found at Appendix 1 of this statement.

Harworth Group plc is the ultimate parent company with 44 wholly or majority owned subsidiaries, together with investments in 3 joint ventures via membership of two limited liability partnerships and one limited partnership (the **Group**). The activities of the Group are undertaken solely in the United Kingdom and all the Group's companies and joint ventures have their registered office in England.

Our Pledge

Modern slavery concerns the exploitation of individuals by another person for personal or commercial gain. It can take various forms and includes servitude, slavery and forced labour but will include the deprivation of an individual's liberty (**Modern Slavery**). Modern Slavery is a crime and a violation of fundamental human rights.

We have a zero-tolerance approach to Modern Slavery and are committed to improving continuously our role in the prevention, deterrence, and detection of it both within our business and our supply chain. It is our policy to conduct all business activities with honesty, integrity and at the highest possible ethical standards. We expect our supply chain partners to aim for the same high standards.

Our business and organisational structure

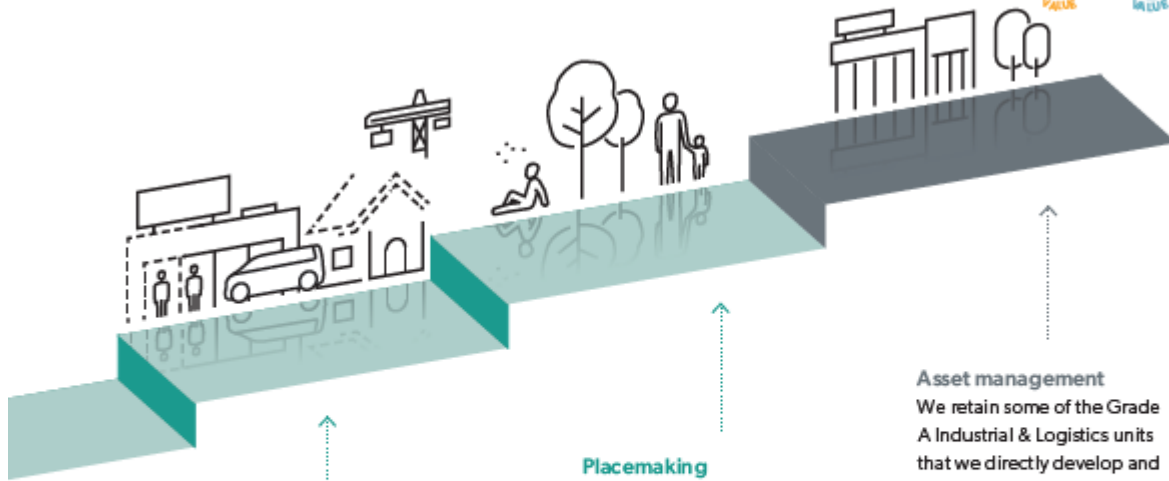
As a regenerator and master developer, Harworth is committed to transforming land and property into sustainable places where people want to live and work. We aim to have a lasting positive environmental and social impact by supporting new homes, jobs and communities. The Harworth Way is our framework for ensuring that our communities, our people and our planet are at the heart of everything we do.

Harworth owns and manages a property portfolio which comprises approximately 15,000 acres of land across around 100 sites located throughout the North of England and Midlands, which was valued at £858,800,000 as at 31 December 2024. Our business is organised into two segments: Capital Growth and Income Generation, which operate across our core regions in the North of England and Midlands.

At the end of the 2024 financial year, the Group employed 138 people across four principal offices. The majority are based at our head office in Rotherham with approximately 36 based at our regional offices in Manchester, Birmingham and Leeds, albeit many of our employees spend a significant amount of their time visiting our sites and meeting with external stakeholders. We operate a flexible working environment with some employees working from home for up to two days per week.

Our business model appears below:

Investment Portfolio



Plot sales & direct development

At our Industrial & Logistics sites, we sell serviced land to developers and develop buildings ourselves for occupiers and owners.


At our Residential sites, we either sell serviced plots to housebuilders or enter into forward-funding agreements with selected partners to deliver alternative tenures such as BTR homes and affordable housing.

Placemaking

We invest in our sites, alongside plot sales and direct development, to provide additional infrastructure, amenities and green and blue spaces. This investment creates a sense of community that improves the wellbeing of residents and those working there, and enhances the attraction and value of our sites.

Asset management

We retain some of the Grade A Industrial & Logistics units that we directly develop and let these to a diverse range of occupiers. This generates a recurring income and allows us to derive further value from the high standards of placemaking and environmental specifications at our sites.

 Read more about Our approach to stakeholders on pages 62 to 67

Strategic Land



Major Developments



Value creation

Acquisition & land assembly

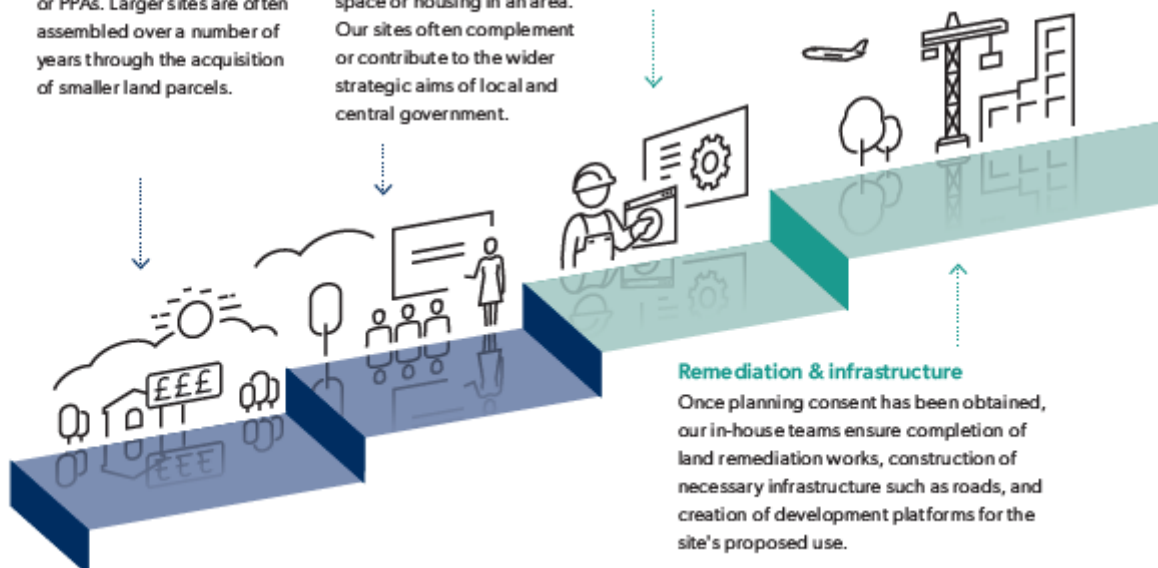
Our acquisition teams work across our regions to identify new sites to add to our portfolio, through freehold purchases, options or PPAs. Larger sites are often assembled over a number of years through the acquisition of smaller land parcels.

Masterplanning

Working with local authorities and other stakeholders, we create a strategic vision for a site which addresses local needs for employment space or housing in an area. Our sites often complement or contribute to the wider strategic aims of local and central government.

Planning approval

Once a strategic vision for a site has been determined, our planners work with local authorities to progress this through the planning system. We have a very high success rate of securing planning consents, while working collaboratively with local stakeholders.

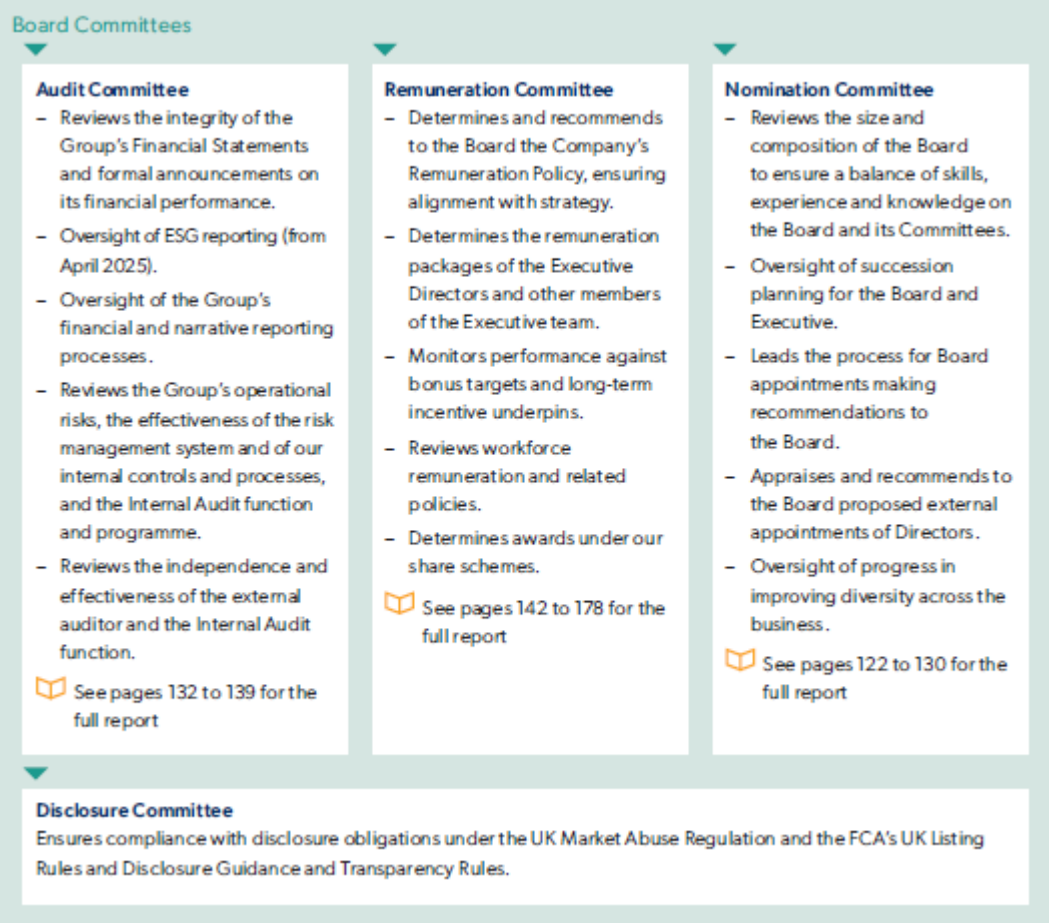


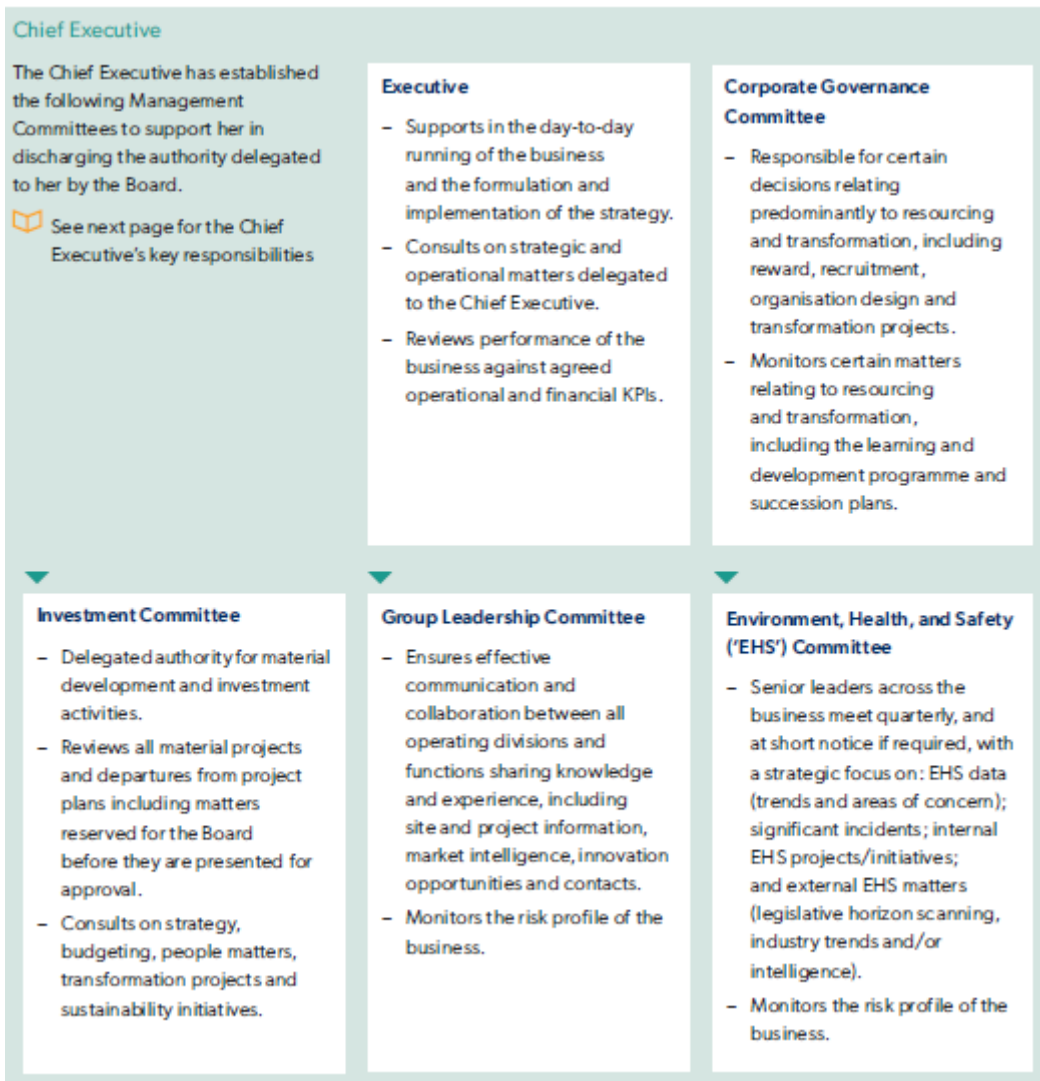
Remediation & infrastructure

Once planning consent has been obtained, our in-house teams ensure completion of land remediation works, construction of necessary infrastructure such as roads, and creation of development platforms for the site's proposed use.

Our internal governance structure

Our internal governance structure appears below:





Our policy

We are committed to ensuring that there is no Modern Slavery or human trafficking in our supply chains or in any part of our business. In May 2017, the Board of Directors approved the implementation of an Anti-Slavery and Human Trafficking policy (our **Policy**), which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business or supply chains. The Policy appears on the Investors section of our website (www.harworthgroup.com/investors/governance/) and in **Appendix 2** to this statement. The Executive team, comprising the Chief Executive, Chief Financial Officer, Chief Operating Officer, Chief Investment Officer, and General Counsel and Company Secretary, has overall responsibility for ensuring compliance with the Policy and is committed to making available sufficient resources for its implementation.

Our Policy remains subject to annual monitoring and review by our General Counsel and Company Secretary.

Implementation of our policies

Our business and employees

All our employees are aware that Harworth operates a zero-tolerance approach to Modern Slavery in our business and supply chains. All our previous modern slavery statements, including this current statement, are available on the Responsibility section of our website (<https://harworthgroup.com/responsibility/>).

All employees have been made aware of the Act and given a copy of our Policy. An email reminder of the Policy, with a copy attached, is sent to employees annually. During the period under review this was sent in June 2024. A further reminder has been sent ahead of publication of this statement. Our Policy remains available throughout the year on our intranet, alongside our other policies.

All new starters are made aware of our policies, including the Policy, as part of their induction process. In the first half of 2018, training on Modern Slavery and human trafficking was delivered to all employees in the form of an online webinar, which also covered topics such as anti-bribery and corruption and whistleblowing. That training was compulsory and undertaken by all employees. Since then, completion of the training has formed a compulsory part of the induction process for all new employees.

We remain committed to the introduction of a compliance training and education programme which will include providing all employees with annual training for key topics including Modern Slavery, to be facilitated by the implementation of a Learning Management System (LMS). We have previously advised that, whilst implementation of such a system has been deferred as part of our wider digital transformation programme, we intend to deliver refresher training ahead of such implementation. Due to pressure on business resources combined with other compliance training deadlines which were already in flight during the reporting period, a refresher session on Modern Slavery is now scheduled for the next reporting period (2025). This will take the form of a compulsory recorded webinar, and we are working in conjunction with an external legal advisor to prepare a tailored session.

Our supply chain

Suppliers and other stakeholders

Our supply chain includes: demolition, land remediation, infrastructure and construction contractors, sub-contractors and consultants; asset managers; and professional services advisors. We also work closely with a wide range of other stakeholders including: landowners, housebuilders, commercial occupiers, funders, local and planning authorities, Combined Authorities, regulatory bodies, Central government and associated arms-length bodies, schools, universities, utilities providers, and joint venture partners.

Demolition, land remediation, infrastructure and construction services present the highest modern slavery risk within our supply chain. Given the size of our property portfolio, we recognise the importance of monitoring “on-site” activity by our employees and our suppliers, to mitigate against the risk of slavery or trafficking taking place on our sites, particularly those which are more remote from our head office and regional offices.

We achieve this in a number of ways, primarily through site visits. Our Estates Management team, supported by appointed agents, carry out scheduled inspections of our sites. All sites are inspected at least once annually. Sites considered to be higher risk, such as those on which development and construction work is being undertaken, are inspected far more frequently. Individual construction projects, which can comprise demolition, land remediation, infrastructure and/or vertical construction works, are themselves subject to a scheduled inspection regime, which inspections are undertaken in our capacity as Client under the Construction (Design and Management) Regulations 2015. When undertaking these site and construction project inspections, the teams complete a prescribed risk inspection report. Colleagues within the business also carry out ad hoc inspections throughout the year and we encourage them to complete a site visit report on each occasion. Our Environmental, Health and Safety team undertake desktop and physical audits of all construction projects and (typically higher risk) certain sites to provide assurance on the effectiveness of our

inspection regime.

Template inspection reports used for site visits include sections covering working conditions for contractors on site. Below is an example:

HEALTH AND WELLBEING	
<i>Welfare facilities available, if applicable</i>	
<i>Evidence of unsuitable working practices or contractors mistreating, or imposing unreasonable working conditions on, its employees</i>	

We operate a Safety Health and Environmental Management system (**SHEMs**) via an online cloud platform. This platform supports reporting of (and the allocation of responsibility for remedial actions identified from) site and construction project risk assessments and incidents, including real time reporting via a mobile application. We continue to see increased reporting as a result of upgrades to the platform to improve its functionality and thereby facilitate and encourage reporting.

New suppliers

In conjunction with our Policy, we also operate a Supplier Code of Conduct on Anti-Slavery and Human Trafficking (our **Code**). This also appears on the Investors section of our website (www.harworthgroup.com/investors/governance/) and in **Appendix 3** to this statement.

As part of our supplier onboarding procedure, all prospective suppliers must complete a due diligence questionnaire. In completing this questionnaire, each prospective supplier must: (i) state whether it is required by the Act to make a modern slavery statement and, if so, provide a copy of it; (ii) tell us what steps it takes to ensure that there is no slavery or trafficking in its own business or supply chains; and (iii) confirm that it will comply with our Code. An extract from our supplier onboarding questionnaire appears below. All responses to these questionnaires are reviewed by our Environmental, Health and Safety team before suppliers are approved and appointed, with escalation to our General Counsel and Company Secretary if appropriate.

All the suppliers whom we have engaged for the first time since June 2017 (when we published our first modern slavery statement) have followed the above onboarding procedure and confirmed that they will comply with our Code.

We will be transitioning from a paper-based to a digital (cloud-based) onboarding process in Q3 when we activate a new supply chain management digital platform, to support the introduction of our new Supply Chain Management and Procurement Policy. Further details on this appear below. This cloud-based process we enable us to direct our smaller suppliers, who do not have an obligation to make an annual modern slavery statement and may have more limited resources to monitor modern slavery risk in their own business and supply chain, to useful resources such as government guidance.

Section 11 – Anti-Slavery and Human Trafficking

Harworth is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or that of any of our suppliers. Please respond to the following questions, which are designed to ensure that you are also committed to ensuring modern slavery is not taking place within your business.

<p><i>Is your business required to produce a statement under Section 54 of the Modern Slavery Act 2015?</i></p> <p><i>If yes, please attach the latest statement or provide a web link</i></p>	
<p><i>Please indicate if your business has any of the following:</i></p> <ul style="list-style-type: none"> • <i>A written anti-slavery policy?</i> • <i>A written whistleblowing policy (or equivalent)?</i> • <i>A code of conduct which includes modern slavery and trafficking content?</i> • <i>Training for staff on stopping modern slavery and trafficking?</i> • <i>A risk assessment to understand the risks of slavery and trafficking in your business and supply chains?</i> 	
<p><i>Does your business take steps to ensure that the third parties with which you contract, and their suppliers (i.e your suppliers' suppliers), ensure that slavery and trafficking are not taking place in their operations and supply chains? Please describe any steps taken.</i></p>	
<p><i>Please describe any other steps your business has taken to ensure slavery and trafficking are not taking place in your business or supply chain.</i></p>	
<p><i>We operate a Supplier Code of Conduct in respect of Anti-Slavery and Human Trafficking, which appears on our website (in the "Corporate Social Responsibility" section). A copy is also available on request. Please confirm that you will comply with that Code of Conduct.</i></p>	

Existing suppliers

When we first published our modern slavery statement on 30 June 2017 we communicated with the majority of suppliers who already formed a part of our supplier base with our expectation that they comply with our Code and asked them to: (i) confirm that they have a zero-tolerance approach to slavery and trafficking; and (ii) explain their policy and procedures in relation to anti-slavery and trafficking.

Supply chain management

In our 2023 statement, we informed on progress of a working group appointed to lead a procurement transformation exercise in combination with an external specialist consultant and internal secondee. This work included (i) evaluation of the onboarding practices for new suppliers, (ii) obtaining a detailed understanding of the composition of our existing supplier base and (iii) identifying priorities for improvements in our procurement and supply chain management and procurement practices.

During the reporting period and as a result of the working group's findings, we have made significant progress towards:

- (i) the introduction of a Supply Chain Management and Procurement policy (**Policy**);
- (ii) the appointment of a Supply Chain Manager, who will support our operational teams, particularly those managing construction projects, to undertake more active management of our supply chain; and

- (iii) the selection of a supply chain management digital platform to support implementation of the Policy, which will introduce more intensive levels of governance, particularly for onboarding and ongoing management of our construction supply chain.

The Policy will organise our supply chain into ten categories, with certain categories (including those comprising our construction contractors and consultants) further organised into disciplines. The suppliers in each category will be allocated one of three Tiers, based predominantly on the risk profile of the services or goods they supply. Tier A suppliers (who supply higher risk services and goods) will be subject to a greater degree of onboarding and relationship management governance than Tier C suppliers (who supply lower risk services and goods). The tiering of each supplier will be subject to regular review. Each procurement or services or goods (from our onboarded supply chain) will be allocated one of three Levels, similarly based on the risk profile of the services or goods being procured. Level 1 procurement (higher risk) will be subject to a greater degree of governance than Level 3 (lower risk) procurement.

The introduction of this Policy, which is scheduled for Q3 of 2025, supported by the appointment of a Supply Chain Manager and implementation of a supply chain management digital platform, will improve the rigour and efficiency of our onboarding process and relationship management of our supply chain, promoting compliance with our Code by our suppliers. It will also facilitate the collection, review of and reporting on more robust supply chain data.

Our precedents

In 2019 we updated our suite of precedent construction contracts and consultancy appointments, in conjunction with one of the firms on our legal panel, and these precedents are reviewed regularly. All our precedents impose obligations on our contractors and consultants in relation to anti-slavery and human trafficking. A further precedent review exercise was progressed during the reporting period with the intention of delivering a comprehensive suite of updated precedents by the end of 2024. The project remains ongoing with an updated target date during 2025.

We remain of the position that we do not expect substantial amendments to be made to our development supply chain agreements because these are already in a mature state. We do expect precedents for use with our wider supply chain to be updated and/or established incorporating provisions to mitigate against modern slavery and human trafficking, notwithstanding the lower risk in those segments of the supply chain.

Reporting

Employees are encouraged to report to the General Counsel and Company Secretary any concerns about the existence of Modern Slavery in our business or supply chains. We operate a robust whistleblowing policy and process, which protects employees in that regard. The effectiveness of that policy and process is reviewed annually by the Audit Committee.

Both the policy and process are reviewed annually. Following the 2022 review, we launched a Harworth dedicated "Speak Up" Hotline, which is available to all employees, suppliers, contractors, and stakeholders, to report knowledge or suspicions of un-ethical or unlawful behaviour. This ensures that anyone who has concerns, including about Modern Slavery in our business or supply chains, has the means of raising these concerns confidentially.

The extension of this facility to suppliers, contractors and external stakeholders has been supported by an awareness campaign, including posters signposting the facility placed at sites which have welfare facilities and updates to our website making the contact details available to all.

We continue to profile our Speak Up Policy internally within the business. There is ongoing communication

across the business to raise awareness of the Speak Up Hotline and usage is monitored and compared to industry statistics to gauge awareness. The facility is explicitly referenced in the induction program delivered to all new starters and now has a dedicated section on our intranet.

Measuring effectiveness

Below are the key performance indicators (KPIs) we have identified to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in our business or supply chains, together with our progress against those KPIs since the last statement.

KPI	Progress during reporting period (Financial Year 1 st January 2024 to 31 st December 2024)
<p>➤ Suppliers: we aim to notify all new suppliers that we expect them to comply with our Code and ask them to: (i) confirm that they have a zero-tolerance approach to slavery and trafficking; and (ii) explain their policy and procedures in relation to anti-slavery and trafficking.</p>	<p>➤ All new suppliers continued to complete our supplier “take-on” questionnaire and confirmed that they will comply with our Code.</p>
<p>➤ Awareness and training: Training on the risks and warning signs of, and measures to prevent, modern slavery should be delivered to all employees.</p>	<p>➤ All new employees completed the online training as part of their induction.</p> <p>➤ Reminders about our Policy were sent to all employees in June 2024.</p> <p>➤ The Speak Up facility continues to be included within the induction program for all new starters within the business.</p> <p>➤ The first “Discovery” phase of a wholesale digital transformation project has been completed, which will now support the formulation and implementation of a digital transformation strategy. This will include implementation of an LMS.</p>
<p>➤ Launch and profile of “Speak Up” Hotline: offering a dedicated Harworth resource to report knowledge or suspicion of unethical or unlawful behaviour, including Modern Slavery within our business or supply chain.</p>	<p>➤ Awareness campaign continues to be promoted internally and externally to ensure all parties are aware of the facility and understand its purpose.</p> <p>➤ Ongoing communication and awareness program to ensure internal colleagues and external stakeholders are aware of the facility.</p> <p>➤ There is now a section on our intranet dedicated to the Speak Up platform.</p>

➤ Comprehensive review of procurement practices: to identify a target operating model for all forms of procurement across the business, the benefits of which will include improved assurance of supply compliance with the Code.	➤ Commencement of procurement transformation exercise, led by an internal secondee. ➤ Findings have enabled the formulation of a draft Supply Chain Management and Procurement Policy, the initiation of recruitment for a Supply Chain Manager (the appointment to which role is imminent at the date of this statement) and of procurement of a supply chain management digital platform. All three are scheduled to “go live” in Q3 2025.
➤ Development of precedent documents: to ensure consistency of terms across our supplier base.	➤ Identification of a full list of existing and required precedents, together with key clauses and provisions to be included within the same.

New KPIs identified
➤ Pending establishment of a new LMS platform as part of the rollout of the digital transformation strategy, compulsory refresher training will be delivered via a recorded webinar delivered by an external legal panel firm .This KPI remains due to the decision to schedule this training for 2025.
➤ We will transition to a new target operating model for supply chain management and procurement, comprising implementation of the new Policy, appointment of a Supply Chain Manager and activation of a supply chain management digital platform by the end of Q3 2025.
➤ All Tier 1 suppliers (determined by the new Policy) will be subject to a re-onboarding process by the end of Q3 2026.

Ongoing review

The Policy and Code (and their effectiveness) remain subject to annual monitoring and review by our General Counsel and Company Secretary.

Lynda Shillaw
Chief Executive
Harworth Group plc
11th June 2025

This policy was approved by the Board in June 2025

Appendix 1: The Group

ANSTY DEVELOPMENT VEHICLE LLP

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: OC428934

BENTHALL GRANGE (IRONBRIDGE) MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 14431018

CADLEY PARK MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 11880206

CHIDSWELL LLP

Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: OC454714

COZE HOMES LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: 15065624

CRIMEA LAND MANSFIELD LLP

C/O Harworth Group Advantage House Poplar Way, Carcliffe, Rotherham, United Kingdom, S60 5TR

Company number: OC429363

CUTACRE COUNTRY PARK MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 11891161

EOS INC. LTD

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 04006353

FLASS LANE MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, S60 5TR

Company number: 10436516

GRIMSBY WEST LLP

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: OC450200

HARWORTH CATALYST 1 LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 13655684

HARWORTH DAWLEY ROAD LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 13522430

HARWORTH ESTATES (AGRICULTURAL LAND) LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 02835767

HARWORTH ESTATES (WAVERLEY PRINCE) LTD.

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 03020652

HARWORTH ESTATES CURTILAGE LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 08261348

HARWORTH ESTATES INVESTMENTS LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 07532134

HARWORTH ESTATES LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 02173536

HARWORTH ESTATES MINES PROPERTY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 08228494

HARWORTH ESTATES NO 2 LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 01827325

HARWORTH ESTATES NORTHUMBERLAND WOODLAND LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 14582429

HARWORTH ESTATES OVERAGE LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 08229136

HARWORTH ESTATES PROPERTY GROUP LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 08232459

HARWORTH ESTATES RESIDENTIAL DEVELOPMENT LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: 14130898

HARWORTH ESTATES WARWICKSHIRE LTD

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 05835402

HARWORTH GATEWAY 45 LLP

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: OC329550

HARWORTH GROUP PLC

Advantage House Poplar Way, Catcliffe, Rotherham, England, S60 5TR

Company number: 02649340

HARWORTH NO 1 LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, England, S60 5TR

Company number: 14415041

HARWORTH PPA HOLDCO LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 16042001

HARWORTH PPA NO 1 LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 16042197

HARWORTH REGENERATION LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 02649352

HARWORTH SERVICES LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 02332274

HARWORTH SURFACE WATER MANAGEMENT (BARDON) LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: 14162313

HARWORTH SURFACE WATER MANAGEMENT (NORTH WEST) LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: 10443184

HARWORTH TRR LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 09039357

LOGISTICS NORTH MC LIMITED

C/O Harworth Estates Property Group Limited Advantage House, Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 09050974

MAPPLEWELL MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 10069792

MOSS NOOK (ST HELENS) MANAGEMENT COMPANY LTD

C/O Harworth Group Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: 13776468

MULTIPLY LOGISTICS NORTH HOLDINGS LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, United Kingdom, S60 5TR

Company number: 10650874

MULTIPLY LOGISTICS NORTH LP

Advantage House Poplar Way, Catcliffe, Rotherham, S60 5TR

Company number: LP017931

NORTHERN GATEWAY DEVELOPMENT VEHICLE LLP

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: OC426781

OLIVE LANE MANAGEMENT COMPANY LTD

C/O Harworth Estates Property Group Limited Advantage House, Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 15238978

POW MANAGEMENT COMPANY LIMITED

C/O Harworth Estates Property Group Limited Advantage House, Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 09100531

RIVERDALE PARK MANAGEMENT COMPANY LIMITED

C/O Harworth Group, Advantage House Poplar Way, Catcliffe, Rotherham, South Yorkshire, S60 5TR

Company number: 11972761

ROSSINGTON COMMUNITY MANAGEMENT COMPANY LIMITED

C/O Harworth Estates Property Group Limited Advantage House, Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 09504577

SIMPSON PARK MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 11243395

SKELTON GRANGE MANAGEMENT COMPANY

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 15952675

SOUTH EAST COALVILLE MANAGEMENT COMPANY LIMITED

C/O Harworth Group Advantage House, Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 12422577

THORESBY VALE MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 11880049

WAVERLEY COMMUNITY MANAGEMENT COMPANY LIMITED

Advantage House Poplar Way, Catcliffe, Rotherham, United Kingdom, S60 5TR

Company number: 08034506

Appendix 2: Anti-Slavery and Human Trafficking Policy

1. Introduction

- 1.1 Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Victims often are unable to leave such situations due to threats, violence, coercion, deception, and/or abuse of power.
- 1.2 Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.
- 1.3 Forms of modern slavery may include, but are not limited to, withholding of passports, being forced to work against a person's will, depending on the employer for housing, food, and other necessities, being recruited through some form of debt arrangement, such as an advance or loan, and limitations on movement of workers.
- 1.4 Victims of modern slavery can be found in almost every sector and every country and this does include the UK.
- 1.5 We have a zero-tolerance approach to Modern Slavery and are committed to continuously improving our role in the prevention, deterrence, and detection of it both within our business and our supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold themselves and their own suppliers to the same high standards.

2. Policy Statement

- 2.1 We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:
 - We have a zero-tolerance approach to modern slavery in our organisation or our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain are the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
 - We are committed to engaging with our stakeholders and direct suppliers to address the risk of modern slavery in our operations and supply chain.
 - As part of our contracting processes, we include a specific prohibition against the use of modern slavery and trafficked labour and a requirement to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
 - Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with our Code of Conduct. Suppliers engaging workers through a third party are also required, via the Code, to

obtain third parties' agreement to adhere to the Code of Conduct.

3. Policy Application

- 3.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers and interns. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 3.2 Workers must ensure that they read, understand and comply with this policy.

4. Responsibility for the policy

- 4.1 The Senior Executive team is committed to making available sufficient resources for the implementation of this policy and has overall responsibility for ensuring compliance.
- 4.2 The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about this policy, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 4.4 Continuous improvement is a key part of our approach to tackling modern slavery and you are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company Secretary.

5. Reporting Modern Slavery

- 5.1 Employees must notify their manager or the Company Secretary as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain or may occur in the future or have any concerns or suspicions relating to compliance with this policy. In the event that employees do not feel comfortable raising their concerns internally, they are also able to use our Harworth dedicated Speak Up Line, which is operated by an independent third party, NAVEX Global. Full details of this facility are available within our Speak Up Policy.
- 5.2 If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible the Company Secretary. Similarly, if the third party would feel more comfortable, they can also use our Speak Up Line. This facility has been extended to all Harworth suppliers, contractors, stakeholders and third parties.
- 5.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately. If the matter is not

remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

6. **Breaches of this policy**

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

1. INTRODUCTION

Harworth is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers, contractors and business partners to adhere to the principles in this Code, in accordance with our contractual terms of engagement. We expect you to require the same standards of your own sub-contractors, suppliers and business partners.

2. CODE OF CONDUCT: PRINCIPLES

- 2.1 Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily.
- 2.2 Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements, and without the imposition of any improper penalties.
- 2.3 Workers shall not be mentally or physically coerced to provide their labour.
- 2.4 Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.
- 2.5 Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- 2.6 Workers shall have their terms of employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.
- 2.7 There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.
- 2.8 Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant workers, their

families and those closely associated with them should not be subject to discrimination due to their nationality.

- 2.9 Workers shall be free to file grievances with their employers about the employer's treatment of them and workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.
- 2.10 Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer-controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means. There shall be no requirement placed on workers that they take accommodation in employer-controlled premises except where this is necessary due to the location or nature of the work being performed.
- 2.12 Where it is necessary to recruit workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws; agree to adhere to this Code of Conduct; and agree to be audited to ensure their compliance with this Code of Conduct.

3. **REPORTING OF BREACHES OF THIS CODE OF CONDUCT**

- 3.1 Any person concerned about a breach of this Code of Conduct or our Anti-Slavery and Human Trafficking Policy may report their concerns on a confidential basis to our Company Secretary, whose contact details appear below. Individuals with concerns are encouraged to provide their name and contact details so that the issues that they raise can be investigated thoroughly. However, we recognise that in some circumstances an individual will only be prepared to raise their concerns on an anonymous basis and we commit to investigate anonymous allegations as thoroughly as possible and to take the necessary remedial action.
- 3.2 In the event that any person does not feel comfortable raising their concerns with the Company Secretary, they are also able to use our Harworth dedicated Speak Up Line, which is operated by an independent third party, NAVEX Global.
- 3.3 Contractors and their subcontractors are to ensure that our Company Secretary's contact details and the details for our Speak Up Line are made available to all workers.

Company Secretary contact details

Chris Birch
Group General Counsel and Company Secretary

Email: cbirch@harworthgroup.com

Harworth Speak Up Line



Mobile:
harworth.navexone.com

Online:
harworth.ethicspoint.com

Phone:
0800 041 8848

Harworth