

Annual Statement for The Financial Year Ending 31st December 2025: Slavery and Human Trafficking

JULY 2026



ANNUAL STATEMENT FOR THE FINANCIAL YEAR ENDING 31ST DECEMBER 2025: 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 2025. 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 56 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 to the highest possible ethical standards. We expect our supply chain partners to aim for the same high standards.

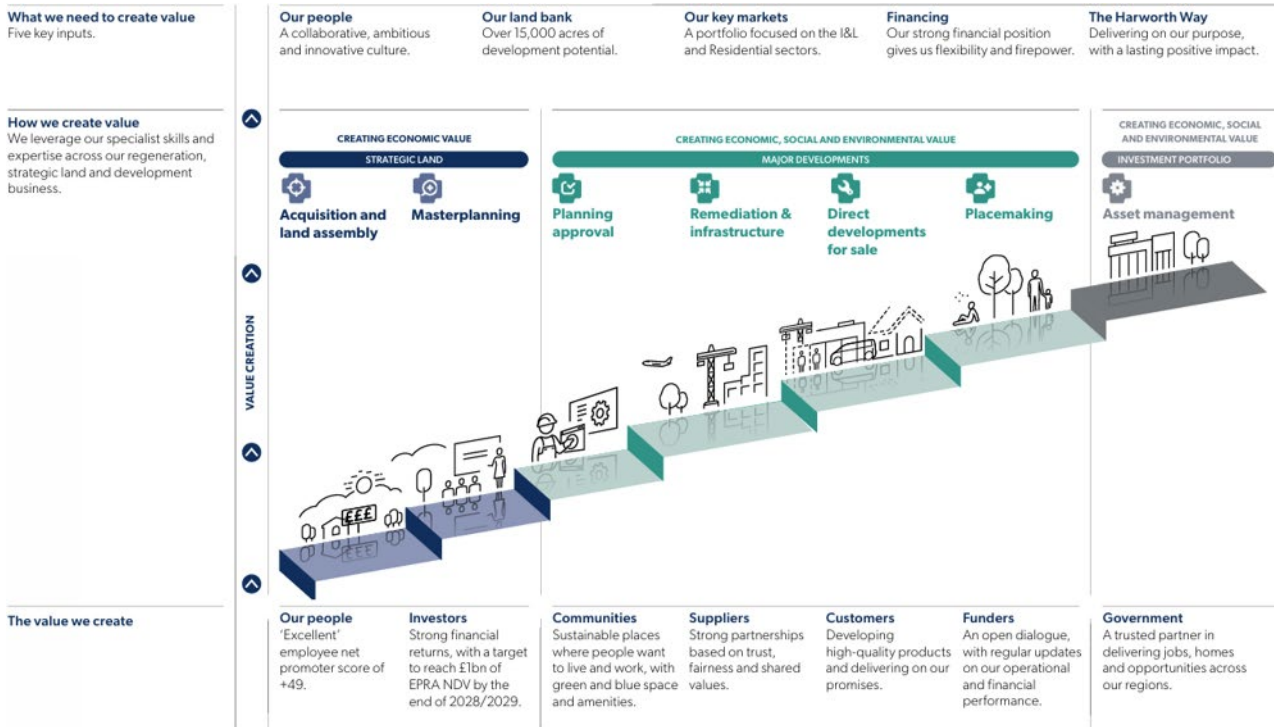
Our Business Model and Organisation Structure

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 £937,225,000 as of 31 December 2025. 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 2025 financial year, the Group employed 143 people across four principal offices. The majority are based at our head office in Rotherham with approximately 30 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:



Our Internal Governance Structure Appears Below:

OUR GOVERNANCE FRAMEWORK



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, Deputy 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 and Awareness 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. The Policy remains available throughout the year on our intranet, alongside our other policies. Regular reminders are issued, typically alongside our updated statement, in our internal bulletin.

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 comprehensive compliance training and education programme. This will include providing all employees with regular training on key topics, including Modern Slavery, administered via a new Learning Management System (LMS). This will enhance the consistency and oversight of training across the business. Implementation of a cloud-based LMS platform is a component of our much wider Digital Transformation Programme, which comprises an extensive overhaul of our technology and data systems spanning multiple reporting periods. The complexity of that wider programme has meant that the "go-live" timing for the LMS has remained fluid. The LMS was not made available during the reporting period but has gone live since the end of the reporting period.

The delivery and administration of online training has begun, alongside the formulation of a training delivery calendar, to ensure training is delivered across the workforce in a targeted and staggered manner. During the reporting period, a refresher training session was prepared by Harworth's in-house Legal team and is ready to be posted to the LMS. Delivery of this refresher training has been given priority in the calendar and will take place in the second half of 2026. As a result, whilst this KPI remains in progress, we are confident that substantive progress will be reported in our FY2026 statement.

Our Supply Chain

Our supply chain includes a broad range of partners, including contractors, subcontractors, consultants, asset managers, and professional services advisers. We also work with a wide range of stakeholders, including landowners, developers, funders, regulatory and planning authorities, educational institutions, utilities providers, and joint venture partners. The Scheme Contractors Category (see more on categorisation below), including demolition, land remediation, infrastructure, and construction services, continues to represent the areas of highest modern slavery risk within our supply chain.

New Supply Chain and Procurement Policy

During the reporting period, we continued to strengthen our approach to supply chain governance through the development and implementation of a new Supply Chain Management and Procurement Policy. This included:

- testing the Policy with an internal focus group representing our highest-risk suppliers (Scheme Contractors);
- appointing a Supply Chain Manager in Q4 2025 to support our operational teams, particularly those managing construction projects, in taking a more active approach to supply chain oversight; and
- selecting the digital supply chain management platform "Causeway" to support implementation of the Policy and strengthen governance.

Under the Policy, suppliers are organised into nine Categories, further grouped into Disciplines, and allocated to one of three Tiers according to their risk profile. Higher-risk (Tier A) suppliers, which include our Scheme Contractors, are subject to enhanced onboarding, relationship management and procurement governance, while lower-risk (Tier C) suppliers remain subject to baseline requirements and proportionately lighter oversight. This tiering will be reviewed regularly to ensure it remains effective and proportionate.

This framework is supported by Discipline Leads, who have accountability for suppliers within their Discipline and have the final say on whether suppliers are and remain onboarded, and Supplier Sponsors, who oversee day-to-day supplier relationship management.

Implementation of the Policy is also supported by the Supply Chain Manager, who is responsible for oversight and assurance, and the deployment of the Causeway digital platform. The platform was selected as part of Harworth's wider Digital Transformation Programme and approved through internal governance processes.

Together, the Policy and the Causeway platform are designed to strengthen onboarding and procurement governance and improve relationship management. They also enhance our ability to collect, review, and report on supply chain data, supporting continuous improvement in oversight and compliance.

With the launch of the new Policy and Causeway platform, all existing suppliers are in the process of being fully re-onboarded and we expect this process to be completed before the end of September. This will include updating compliance documentation and reaffirming adherence to the Harworth policies available on our website (<https://harworthgroup.com/policies/>). These include our Anti-Slavery and Human Trafficking Policy and Supplier Code of Conduct, both of which address anti-slavery and human trafficking risks.

As part of this re-onboarding process, each supplier must either agree to these terms or submit its own terms for internal review by our Supplier Sponsors and Discipline Leads. Our cloud-based process also supports smaller suppliers by providing access to helpful resources, including government guidance. This is particularly important for suppliers that may not be required to publish an annual modern slavery statement and may have fewer resources to manage modern slavery risks within their own operations and supply chains.

Assurance

Given the scale of our property portfolio, we remain committed to robust monitoring of on-site activities, particularly construction related activities, by both our employees and health and safety advisers to help mitigate modern slavery and human trafficking risks, particularly at sites remote from our main offices.

Our Environment, Health and Safety team supports the prevention of modern slavery and unethical labour practices through its oversight of construction activities carried out across our sites and within our supply chain. We seek assurance that principal contractors have appropriate arrangements in place to provide safe, secure and dignified working conditions across our sites. This includes suitable site conditions, adequate welfare facilities, safe systems of work, and the fair treatment of workers. We recognise that where these standards are not met, there is an increased risk of exploitation and harm, including risks associated with modern slavery.

Activities are managed in line with our ISO 45001-aligned health and safety management system, which supports consistent oversight of these standards across our operations and supply chain.

To strengthen our due diligence processes, we have implemented the "Lucidity" EHS management system (another component of the Digital Transformation Programme). This system records inspections, audits and corrective actions, providing enhanced visibility and accountability across our sites and supply chain. Through this process, we monitor site conditions and identify behaviours that may indicate potential risks within the workforce or supply chain, including those relevant to modern slavery and labour standards.

As part of routine inspections of construction sites and activities, the following areas are considered:

- **Welfare Provisions:** Inspection of welfare facilities to ensure they are suitable, accessible and maintained to an appropriate standard, supporting the health, wellbeing and basic needs of workers on site.
- **Induction, Training and Briefing:** Sample checks of site induction processes and associated records, including training certifications (such as competency cards) and evidence of ongoing briefings, to confirm that workers are appropriately informed, competent and engaged in safe working practices.

Findings from these inspections are recorded within Lucidity, with actions raised and tracked where improvements are required. This supports the early identification of poor practices, which may also be indicative of broader labour standards concerns, including risks related to modern slavery.

Alongside second line assurance of construction activities on our sites, our Environment Health and Safety team also oversee a programme of health and safety assurance across our wider land portfolio. 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. 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.

Legal Precedents

During the reporting period, we instructed an external legal panel firm to undertake a periodic review of, and make update to, our suite of precedent construction contracts and consultancy appointments. The updated precedents were made available to the business in Q1 2026. These precedents are maintained and reviewed regularly. All our precedents impose commitments and obligations on our contractors and consultants in relation to anti-slavery and human trafficking.

Reporting

Employees are encouraged to report any concerns including relating to modern slavery within our business or supply chains, either directly to the General Counsel & Company Secretary or via the confidential "Speak Up" whistleblowing hotline. The hotline is operated by an independent third-party provider and is available to employees, suppliers, contractors, and other stakeholders to report suspected unethical or unlawful behaviour. This ensures concerns, including those relating to Modern Slavery, can be raised confidentially. A robust whistleblowing policy underpins these arrangements and is reviewed annually by the Head of Audit & Assurance and approved by the Audit Committee.

Awareness of the whistleblowing facility is supported through ongoing internal communications to promote the Speak Up Hotline, with usage monitored and benchmarked against industry data to assess awareness. The facility is embedded within the induction programme for all new starters and is clearly signposted on the intranet.

Awareness is also promoted externally through posters displayed at sites with welfare facilities and through information published on our website, ensuring contact details are accessible to all stakeholders.

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 January 2025 to 31 December 2025) In some cases, includes additional post reporting period commentary
<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>	<ul style="list-style-type: none"> 100% of all new suppliers continued to complete our manual supplier "take-on" questionnaire and confirmed that they will comply with our Code. <i>*Post reporting period, a re-onboarding process began for all suppliers onto our new Causeway digital platform, which requires a re-statement of commitment to our Code at onboarding and then annually thereafter. In our FY2026 statement, we expect to report that all suppliers have been re-onboarded, after which we plan to retire this KPI but will continue to provide assurance in future statements as to compliance with our supply chain management governance requirements.</i>
<p>Suppliers: new supplier management system.</p>	<ul style="list-style-type: none"> We appointed a Supply Chain Manager to support our operational teams, particularly those managing construction projects, in taking a more active approach to supply chain oversight. Harworth selected Causeway as the digital Supply Chain Management Platform to support supplier onboarding and the implementation of the Supply Chain Management and Procurement Policy, including mandatory confirmation of relevant supplier standards and policies. <i>*Post reporting period, the Causeway digital platform was deployed into the business. In our FY2026 statement, we expect to report that all suppliers have been migrated to the platform, after which we plan to retire this KPI but will continue to provide assurance in future statements as to the continued operation and effectiveness of the digital platform.</i>

<p>Site Monitoring and Due Diligence:</p>	<ul style="list-style-type: none"> • We implemented the “Lucidity” Environment, Health and Safety management system to support enhanced due diligence and governance across site activities. • We introduced a new set of standards for the management of contractors in our capacity as Client under the Construction (Design and Management) Regulations 2015. A structured regime of second line assurance was also introduced comprising both desktop and physical audits undertaken by the EHS team. <p><i>*This KPI will be retained for future statements to report on our ongoing assurance programme for construction activities and across our land portfolio.</i></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>	<ul style="list-style-type: none"> • All new employees completed the online training as part of their induction. • Reminders about our Policy were sent to all employees in June 2025. • For the reasons outlined in the statement above, we could not launch our new LMS during the reporting period, but a refresher training session was prepared by Harworth’s in-house Legal team and was ready to be rolled out. <p><i>*Post reporting period, the LMS has gone live and the delivery and administration of online training has begun. The refresher training on modern slavery prepared by the Legal team has been given priority in the calendar and will take place in the second half of 2026. This KPI will be retained for future statements to ensure that we continue to report on our ongoing awareness activities.</i></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>	<ul style="list-style-type: none"> • The annual review of our Speak Up facility was undertaken in June 2025 and continues to be included within the Legal & Governance induction programme for all new starters within the business. • The awareness campaign continues to be promoted internally and externally to ensure all parties are aware of the facility and understand its purpose. • Ongoing communication and awareness programme ensures internal colleagues and external stakeholders are aware of the facility. • A section on our intranet is dedicated to the Speak Up platform. <p><i>*This KPI will be retained for future statements to ensure that we continue to report on our ongoing commitment to providing employees and third parties with an effective means to report concerns, including about modern slavery.</i></p>

<p>Development of precedent documents: to ensure consistency of terms across our supplier base.</p>	<ul style="list-style-type: none"> • During the reporting period, we instructed an external legal panel firm to undertake a periodic review of, and make updates to, our suite of precedent construction contracts and consultancy appointments. • All our precedents impose commitments and obligations on our contractors and consultants in relation to anti-slavery and human trafficking. • The updated precedents were made available to the business in Q1 2026. These precedents are maintained and reviewed regularly. <p><i>*We plan to retire this KPI but will continue to provide assurance in future statements as to the continued maintenance of our library of precedents.</i></p>
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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
3rd July 2026

This policy was approved by the Board in July 2026

Appendix 1: The Group

ANSTY DEVELOPMENT VEHICLE LLP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: OC428934
BENTHALL GRANGE (IRONBRIDGE) MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 14431018
CADLEY PARK MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 11880206
CHIDSWELL LLP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: OC454714
COZE HOMES LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 15065624
CRIMEA LAND MANSFIELD LLP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: OC429363
CUTACRE COUNTRY PARK MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 11891161
EOS INC. LTD 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 04006353
FLASS LANE MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 10436516
GRIMSBY WEST LLP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: OC450200
HARWORTH BNG (ALLERTON BYWATER) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16726789
HARWORTH BNG (GASCOIGNE) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16727614
HARWORTH BNG (KILLAMARSH) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16727610

HARWORTH BNG (SEDGEBROOK) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16807877
HARWORTH BNG (THORNE) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16784739
HARWORTH CATALYST 1 LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 13655684
HARWORTH DAWLEY ROAD LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 13522430
HARWORTH DEVELOPMENT HOLDCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16630239
HARWORTH I&L DEVELOPMENT MANAGEMENT LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16630902
HARWORTH INVESTMENTS HOLDCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 14415041
HARWORTH LEGACY HOLDCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 02332274
HARWORTH MANAGEMENT SHELFSCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16707757
HARWORTH PARTNERSHIP HOLDCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16630444
HARWORTH ESTATES (AGRICULTURAL LAND) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 02835767
HARWORTH ESTATES (WAVERLEY PRINCE) LTD. 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 03020652
HARWORTH ESTATES CURTILAGE LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 08261348
HARWORTH ESTATES INVESTMENTS LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 07532134

<p>HARWORTH ESTATES LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 02173536</p>
<p>HARWORTH ESTATES MINES PROPERTY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 08228494</p>
<p>HARWORTH ESTATES NO 2 LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 01827325</p>
<p>HARWORTH ESTATES NORTHUMBERLAND WOODLAND LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 14582429</p>
<p>HARWORTH ESTATES OVERAGE LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 08229136</p>
<p>HARWORTH ESTATES PROPERTY GROUP LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 08232459</p>
<p>HARWORTH RESIDENTIAL DEVELOPMENT MANAGEMENT LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 14130898</p>
<p>HARWORTH ESTATES WARWICKSHIRE LTD 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 05835402</p>
<p>HARWORTH GATEWAY 45 LLP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: OC329550</p>
<p>HARWORTH GROUP PLC 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 02649340</p>
<p>HARWORTH PPA HOLDCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16042001</p>
<p>HARWORTH PPA NO 1 LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16042197</p>
<p>HARWORTH PPA NO 2 LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16630763</p>
<p>HARWORTH REGENERATION LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 02649352</p>

<p>HARWORTH STRATEGIC LAND HOLDCO LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 16629830</p>
<p>HARWORTH SURFACE WATER MANAGEMENT (BARDON) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 14162313</p>
<p>HARWORTH SURFACE WATER MANAGEMENT (NORTH WEST) LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 10443184</p>
<p>HARWORTH TRR LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 09039357</p>
<p>LOGISTICS NORTH MC LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 09050974</p>
<p>MAPPLEWELL MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 10069792</p>
<p>MOSS NOOK (ST HELENS) MANAGEMENT COMPANY LTD 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 13776468</p>
<p>MULTIPLY LOGISTICS NORTH HOLDINGS LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 10650874</p>
<p>MULTIPLY LOGISTICS NORTH LP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: LP017931</p>
<p>NORTHERN GATEWAY DEVELOPMENT VEHICLE LLP 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: OC426781</p>
<p>OLIVE LANE MANAGEMENT COMPANY LTD 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 15238978</p>
<p>POW MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 09100531</p>
<p>RIVERDALE PARK MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 11972761</p>
<p>ROSSINGTON COMMUNITY MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 09504577</p>

SIMPSON PARK MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 11243395
SKELTON GRANGE MANAGEMENT COMPANY 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 15952675
SOUTH EAST COALVILLE MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 12422577
THORESBY VALE MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR Company number: 11880049
WAVERLEY COMMUNITY MANAGEMENT COMPANY LIMITED 1 Harworth Way, Unit 1, Harworth Way, Rotherham, United Kingdom, S60 5GR 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, including 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.

Appendix 3: Supplier Code of Conduct on Anti-Slavery and Human Trafficking

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.
- 2.11 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

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