

MODERN SLAVERY STATEMENT

Who we are

Balmoral Group Holdings Limited (BGHL) is a privately owned company, that last year, comprised of four manufacturing subsidiaries and one property owning subsidiary, Balmoral Park Limited.

The four manufacturing companies are:

- Balmoral Comtec Limited; based in Aberdeen, Scotland is dedicated to technologically driven composite and polymer manufactured solutions. The company is focused on key market differentiators that include innovation, technical expertise and manufacturing efficiency as well as offering a comprehensive product portfolio. Its products are widely used across oil and gas and renewable energy markets. **Balmoral Comtec also incorporates two offsite locations. Balmoral Newcastle based in North Shields Tyne & Wear, supports Comtec's demand for high quality rotational moulding tools, steel fabrication and machining requirements. Balmoral Montrose based in Montrose Port Angus, provides large scale composite structures for subsea applications.**
- Balmoral Tanks Limited; based in Llantrisant, Wales and Thurnscoe, England offer turnkey packages that include tank design, manufacturing, civils groundwork, installation, mechanical, commissioning and after sales services.
- Water Environmental Treatment Ltd; based in Tamworth, England is a well-established Legionella compliance and water treatment company managing thousands of sites throughout the UK under one mission: "To provide our clients with a business sensible and reliably simple approach to water system management".
- Blaze Manufacturing Solutions Ltd; based in Laurencekirk, Aberdeenshire, designs & manufactures fire safety protection, detection and loss prevention solutions for the oil and gas, renewable energy, mining, nuclear, commercial and industrial sectors.

Our responsibilities

We continue to take our social responsibilities very seriously and conduct our business in accordance with our core values of respect, integrity, accountability, innovation, motivation, and customer focus. As a company we are committed to understanding more about modern slavery and improving our practices to ensure that slavery and human trafficking are not present in any area of our business or supply chain.

We pride ourselves in acting ethically and with integrity in all our business dealings and relationships and expect the same ambitious standards from our contractors, suppliers, customers, and other business partners.

Our commitments

We are continually committed to the following actions:

- Creating a safe working environment for everyone working at our facilities
- Upholding the principles defined by the United Nations Universal Declaration of Human Rights
[Universal Declaration of Human Rights | United Nations](#)
- Adhering to the labour laws of all countries in which it operates
- Being available to hear and act regarding all legitimate employment-related concerns
- Providing adequate welfare facilities as and when required
- Ensuring that modern slavery or human trafficking is not present in the company's supply chains

Review of our supply chain

As end-to-end solutions partner for many markets a sizeable proportion of the group's supply chain includes large multi-nationals involved in the supply of bulk raw materials. UK-based suppliers form a large part of the remainder of the supply chain.

The Group continually evaluate how to identify and address risks in each category of our supply chain, including those related to modern slavery and human trafficking. To map and mitigate risk, we use a variety of methods which allow us to undertake due diligence on our suppliers and ensure that we have appropriate policies and contractual terms in place, so that our suppliers understand the standards that we require of them. To the extent that our suppliers do not adhere to our standards, there can be material consequences, including the termination of our relationship with them.

We have done this by undertaking the following actions:

- Continuing to work with our supply chain to form contractual partnerships which encourage transparency of any potential risks in relation to modern slavery
- Continue to improve on our assessment of our critical members of our supply chain to identify any potential risks to their business and ours including modern slavery
- Continued review and assessment of our current supplier base
- Implemented an online learning portal for **all relevant personnel within the Group** in corporate governance including Modern Slavery

Our vision

We have a goal to help eradicate all forms of modern slavery and human trafficking and passionately believe that the responsibility for this lies with us all. To achieve this goal, we will:

- Utilise regulatory authorities such as UK Government, Chartered Institute of Procurement and Supply (CIPS), Stronger2Gether checklists to ensure our Modern Slavery questions on our Vendor Assessment Questionnaire (VAQ) are relevant and current

- Continue to develop our knowledge and provide staff training **to the Group** relating to the Modern Slavery Act 2015
- Continue to foster long term relationships with our suppliers, through which policies aimed at minimising a range of risks can be developed
- Visiting, where possible, all our **critical** suppliers to allow us to better assess our supplier's commitment to removing slavery and human trafficking
- Maintain our Approved Vendor List to ensure our supply chain is also committed to removing slavery and human trafficking
- Continue to review and, where identified, improve our current procedures and policies
- Implement all current practices throughout **the Group** and any future companies who come under the control of Balmoral Group Holdings Limited.

This statement relates to all the above companies pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the fiscal year **to 31 March 2023**. It has been approved by BGHL board of directors and shall be reviewed annually.

A handwritten signature in black ink, appearing to read 'Kevin Binnie', with a large, sweeping flourish at the end.

Kevin Binnie

Corporate Director

30th of September 2023

