Modern Slavery Statement

Introduction

This policy applies equally across all Supreme Group businesses (hereafter, “the Company”).

What is Modern Slavery?

Modern slavery is an all-encompassing term to describe the offences of human trafficking and slavery, servitude and forced or compulsory labour, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain in a direct violation of their fundamental human rights.

The Company has a zero-tolerance approach to modern slavery within the business and supply chains and is committed to acting ethically and with integrity in all dealings and relationships. We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in the Company or within any approved, third parties operating on its behalf.

Scope

This policy applies to all Company employees and any approved 3rd party contractors operating in any capacity and location on behalf of the Company.

The Company’s aim is to use all reasonable endeavours to ensure no modern slavery or human trafficking in any form is taking place in our supply chain or in any part of our business.

To support this commitment, we:

- Promote fair recruitment and lawful employment practices.
- Expect suppliers and partners to respect human rights and employment law.
- Encourage prompt reporting and protect people who raise genuine concerns.
- Review related recruitment, Right to Work, safeguarding, whistleblowing and HR procedures.

Risk Assessment

Risks will be assessed by activity, with controls and actions recorded. The risk assessment will be reviewed at least annually.

We will apply proportionate, risk-based checks through our audit programme. The audit will confirm which controls are operating and will identify any non-conformance or opportunities for improvement.

Modern Slavery Prevention

The following controls will be applied:

Recruitment

- Verify identity and Right to Work
- Report concerns of charging fees, retaining identity documents, coercion or unusual third-party control
- Screen relevant agencies, suppliers and subcontractors and set clear contractual expectations
- Escalate serious concerns to senior leadership

Staff Awareness and Training

- Help managers recognise signs such as intimidation, withheld wages, restricted freedom and excessive hours
- Provide guidance for HR, recruitment and all management staff
- Introduce toolbox talks to help staff recognise signs and increase awareness of the importance of reporting concerns
- Agree refresher arrangements and completion monitoring

Measuring Progress

We will monitor the following indicators:

- Higher risk activities with documented actions
- Higher risk suppliers reviewed
- Relevant staff and managers completed awareness training
- Concerns reported, assessed and escalated, including response times and outcomes
- Annual policy review and statement approval completed

Raising and Responding to Concerns

The following procedure must take place where there are any concerns that someone is a victim of modern slavery or human trafficking. The Company will ensure that, as far as is reasonably practicable and appropriate, staff are aware that victims of modern slavery or trafficking will often not self-identify. Many will present with a different issue. The following process will apply.

1) A concern is identified - this could be an individual(s) as a victim or perpetrator, or an individual(s) informs the Company of a concern they have;

2) If an individual is, or group of people are, in immediate risk of danger or harm, the police must be immediately notified on 999;

3) The staff member must raise concerns, in the first instance, with their line manager or HR;

4) On receipt of information, Company senior managers will confirm next steps which could include escalating details to the authorities (e.g. the police).

5) Individuals can use a confidential internal reporting mechanism known as Right Line using the email address rightline@supremeguarding.com.

6) Unresolved concerns can be escalated externally using the UK Modern Slavery & Exploitation Helpline 08000 121 700.

Responsibilities and Review

- Directors: oversee the approach, review risks and annual approval
- HR & Compliance: coordinate assessment findings, reporting, training oversight and action plan
- Managers and suppliers: raise concerns and apply agreed controls
- Review this document annually and after material changes to risks or operations

Annual Statement and Approval

Reporting period: 01 July 2025 – 30 June 2026

Next period: 01 July 2026 – 30 June 2027

2025-2026 actions and results:

- Deepen Supply Chain Mapping & Risk Profiling: Complete a comprehensive risk-mapping exercise across all active Tier-1 suppliers and third-party labour providers, categorising vendors by sector and geographic risk to prioritise on-site audits and enhanced due diligence checks.
- Strengthen Contractual & Onboarding Controls: Roll out updated supplier onboarding questionnaires and embed explicit anti-slavery, ethical recruitment (Employer Pays Principle), and audit-access clauses into all new and renewed supplier and agency contracts.
- Conduct an internal gap analysis against recognised social audit standards and complete a pilot independent social audit on our highest-risk operational site to benchmark compliance and establish a scalable audit programme.
- Expand Workforce & Management Training: Achieve a minimum 95% completion rate for role-specific modern slavery awareness training across HR, procurement, and site management, supported by quarterly frontline toolbox talks to ensure operational staff can identify and escalate red flags.

- Enhance Reporting & Grievance Mechanisms: Audit and promote our internal whistleblowing channels alongside external support signposting (such as the UK Modern Slavery & Exploitation Helpline) across all operational sites to ensure workers and contractors have accessible, confidential avenues to raise concerns without fear of retaliation.
- Formalise KPI Tracking & Board Oversight: Establish a standardised quarterly compliance dashboard tracked by HR & Compliance, added as an agenda item in our Quarterly Management Review Meetings, and reviewed by the Board of Directors to measure audit outcomes, training completion, and incident response times.

Results to be logged after management review in December 2026

Status: Draft

Approved by: Andy Lane, Managing Director (For and on behalf of the Board of Directors)

Director signature:

Publication date: 26 October 2026

Where section 54 applies, the annual statement must be approved, signed and published as required by law. Publication within six-months of year-end is recommended (by 31 December)