



## Modern Slavery Policy

The Heaton Group is committed to driving out acts of modern-day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company upholds the spirit and intentions of the Modern Slavery Act 2015 through publication of a policy statement setting out the steps we take to prevent modern slavery and related.

We will ensure transparency within the Company and suppliers of goods and the larger supply chain and services to the Company through steps which include:

- Assessing and reducing the risk in the business of modern slavery practices occurring e.g. checking the authenticity of papers proving a right to work in the UK.
- Having robust procurement policies that ensure our supply chain is scrutinised for compliance and consequences of non-compliance are clear and actioned i.e. that commercial relationships with suppliers, contractors and other business partners will not be entered into (or terminated if existing).
- Providing information to staff on the warning signs that might indicate that modern slavery is taking place.
- Promoting to staff the importance of raising immediately any concerns they may have.
- Protecting staff who are 'whistle blowers' in respect of concerns they have about modern slavery.

### Board Member Approval:

This statement has been approved by the Company's board of directors, who will review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to read 'J. H.' or 'John'.

Date: 1 September 2025

