



GLOBAL ANTI-SLAVERY & HUMAN TRAFFICKING STATEMENT

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Applies Globally: Subject to applicable local mandatory law

1. STATEMENT

Engineering Projects TM LTD ("EPTM LTD") is committed to respecting human dignity and opposing slavery, servitude, forced labour and human trafficking.

EPTM LTD has zero tolerance for slavery and human trafficking in its business operations and supply relationships.

2. UK LEGAL FRAMEWORK

This Statement is principally structured around the:

- Modern Slavery Act 2015;
- applicable UK employment legislation;
- applicable criminal law; and
- applicable supply-chain requirements.

Section 54 of the Modern Slavery Act 2015 establishes transparency requirements for certain commercial organisations that meet the statutory conditions, including the applicable turnover threshold.

Where section 54 applies to EPTM LTD, EPTM LTD will comply with its statutory requirements.

3. GLOBAL APPLICATION

EPTM LTD's commitment applies to its global operations and business relationships, subject to applicable law.

Where local law imposes stronger or additional requirements concerning:

- forced labour;
- human trafficking;
- child labour;
- worker exploitation;
- recruitment;
- working conditions; or
- supply-chain transparency,

EPTM LTD will comply with those mandatory requirements where applicable.



4. ZERO TOLERANCE

EPTM LTD does not tolerate:

- slavery;
 - servitude;
 - forced labour;
 - compulsory labour;
 - human trafficking;
 - exploitation;
 - unlawful child labour;
 - withholding of identity documents for exploitative purposes; or
 - coercive recruitment.
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5. BUSINESS OPERATIONS

EPTM LTD seeks to ensure that its own operations are conducted responsibly and ethically.

EPTM LTD expects personnel acting on its behalf to respect applicable employment, labour and human–rights requirements and to raise concerns where serious exploitation or abuse is suspected.

6. SUPPLIERS AND BUSINESS PARTNERS

EPTM LTD expects relevant suppliers, contractors, consultants and business partners to:

- comply with applicable law;
- respect workers' rights;
- avoid forced labour;
- avoid human trafficking; and
- maintain appropriate employment practices.

Where appropriate, EPTM LTD shall include relevant contractual requirements concerning modern slavery, human trafficking, forced labour and worker protection.

EPTM LTD will not knowingly engage a supplier or business partner for the purpose of circumventing its requirements concerning slavery, trafficking or worker exploitation.

7. DUE DILIGENCE

EPTM LTD applies a proportionate, risk–based approach to modern–slavery and human–trafficking due diligence.

Where a relationship presents relevant risk, EPTM LTD will, as appropriate:

1. identify the supplier, contractor, consultant, recruitment provider or other relevant business partner and its proposed role;
2. consider the nature, location and structure of the relationship and the workers or labour arrangements involved;



3. assess relevant indicators of forced labour, trafficking, coercive recruitment, unlawful child labour, worker exploitation or inadequate worker protection;
4. consider available information concerning the business partner's labour practices, reputation and compliance;
5. obtain appropriate supporting information where enhanced review is warranted;
6. obtain appropriate management approval before engagement where the assessed risk requires it;
7. include suitable contractual requirements concerning modern slavery and worker protection where appropriate; and
8. maintain proportionate records of the review and relevant decisions.

Higher-risk relationships may require enhanced due diligence and prior written approval by a Company Director before engagement where practicable.

Relevant higher-risk indicators may include high-risk jurisdictions or sectors, recruitment through labour agents, extensive subcontracting, migrant or vulnerable workers, opaque labour arrangements, inadequate worker protections, credible adverse information or other indicators of exploitation.

Due diligence may be repeated or reviewed where material changes, credible concerns, incidents or other relevant risk indicators arise.

8. RISK ASSESSMENT

EPTM LTD recognises that modern-slavery and human-trafficking risks may vary according to the nature, scale, location and complexity of its activities and business relationships.

Potential risks may include:

- geographic risk;
- sector risk;
- recruitment risk;
- subcontracting;
- labour-agent risk;
- vulnerable or migrant worker risk;
- inadequate worker protections; and
- other circumstances associated with forced labour, trafficking or exploitation.

EPTM LTD will consider relevant risk factors when determining the level of due diligence, contractual controls, monitoring and other measures appropriate to a particular relationship.

Where credible information indicates increased risk, EPTM LTD may require enhanced review, corrective action or reconsideration of the relevant relationship.



9. REPORTING CONCERNS

Personnel and business partners are encouraged to raise concerns regarding suspected slavery, human trafficking, forced labour, unlawful child labour, coercive recruitment or serious worker exploitation.

Official Reporting Channel

Concerns may be submitted through the EPTM LTD official Contact page and secure contact forms.

Where appropriate, a concern may also be raised directly with EPTM LTD management or a Company Director.

Reports should be made honestly and in good faith.

Concerns will be reviewed appropriately and, where reasonably practicable and legally permissible, handled confidentially.

Nothing in this reporting process prevents a person from reporting suspected unlawful conduct to a competent authority where legally entitled or required to do so.

10. NON–RETALIATION

EPTM LTD does not tolerate retaliation against individuals who, in good faith, raise genuine concerns, seek advice, refuse to participate in suspected exploitative conduct or assist with an appropriate investigation.

Nothing in this Statement prevents a person from exercising any legal right to report suspected unlawful conduct to a competent authority.

11. TRAINING AND AWARENESS

EPTM LTD maintains a proportionate awareness and training framework concerning modern slavery and human trafficking.

Relevant personnel and, where appropriate, relevant business partners will receive information, guidance or training appropriate to their responsibilities and the risks associated with their roles.

Training and awareness may cover:

- modern slavery;
- forced labour;
- human trafficking;
- ethical procurement;
- responsible recruitment;
- worker rights and protections;
- supply–chain risks; and
- reporting and escalation procedures.

The frequency and depth of training will reflect the relevant role, risk exposure and identified needs. EPTM LTD will retain appropriate records of material training or awareness activities.



12. REMEDIATION

Where EPTM LTD identifies credible evidence of slavery or human trafficking connected with its operations or relevant supply relationships, it will take appropriate corrective action proportionate to the circumstances, which shall include consideration of:

- investigation;
- immediate risk mitigation;
- corrective measures;
- supplier engagement;
- enhanced due diligence;
- suspension or termination of relationships where appropriate;
- referral to appropriate authorities;
- appropriate contractual or commercial remedies; and
- support for affected persons where appropriate and legally possible.

EPTM LTD will seek to avoid actions that unnecessarily increase risks to affected or potentially vulnerable persons.

13. GOVERNANCE, MONITORING AND REVIEW

Responsibility for maintaining EPTM LTD's approach to modern slavery and human trafficking rests with Company management.

Management will oversee the implementation of this Statement and will periodically review relevant risks, due-diligence measures, contractual controls, training, reported concerns, incidents and corrective actions.

The Statement and related controls may be reviewed or updated following:

- changes in applicable law;
- changes in EPTM LTD's activities or geographical operations;
- changes in supply or business relationships;
- identified risks or incidents;
- lessons learned;
- relevant regulatory expectations; or
- recognised good practice.

Where appropriate, EPTM LTD will strengthen its procedures and controls.

Relevant records may include due-diligence assessments, approvals, contractual requirements, training records, reports, investigations, corrective actions and review activities.



14. TRANSPARENCY

Where legally required, EPTM LTD will publish an appropriate modern–slavery statement satisfying applicable statutory requirements.

EPTM LTD will seek to ensure that public statements concerning its modern–slavery and human–trafficking approach are accurate, appropriately reviewed and consistent with its actual policies and controls.

15. GLOBAL LEGAL PRINCIPLE

This Statement does not override mandatory local laws in jurisdictions outside of the United Kingdom.

In jurisdictions outside of the United Kingdom, where local law imposes additional requirements, those requirements will apply where legally applicable.

Where EPTM LTD's corporate requirements are stricter than applicable local law, EPTM LTD will generally apply its stricter requirements unless doing so would itself breach applicable law.
