

MODERN SLAVERY STATEMENT

SEPTEMBER 2025

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INTRODUCTION

This statement sets out Bauder UK's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2025 to 31 March 2026.

As part of the construction industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking, and we continue to take our responsibility very seriously.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

OUR POLICY

We are working towards establishing a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation. We will also actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour.

Our Company Philosophy Values are Trust, Leadership, Communication, Mutual Appreciation, Change and Development, Commonly Agreed Goals and Fun and Enjoyment. These underpin our culture and how we do business to achieve Best Customer Satisfaction and Best Sustainability. They are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. All employees attend Philosophy workshops to understand the values and the behaviours expected. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

OUR STRUCTURE AND SUPPLY CHAINS

Bauder Limited in the UK and Ireland is a daughter Company of Bauder GMBH forming one of 14 group of Bauder companies situated throughout Europe, with over 2000 direct employees. Each of the daughter companies operate as a separate legal entity; they are not a worldwide partnership. This statement relates to the UK and Ireland entity, its structure and supply chain.

RELEVANT POLICIES AND PROCEDURES

We operate the following policies and procedures that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Employment:

We have robust recruitment processes in line with UK employment laws, including verifying identify; 'right to work' document checks; employment history checks and verification; contracts of employment and checks to ensure everyone employed is 16 and above.

We offer market-related pay and reward, which is reviewed annually and linked to professional benchmarks. This ensures we remain fully compliant with national living wage within the UK. In addition, we offer an enhanced benefits package, providing additional health and welfare options to support our employees (and their families).

Recruitment

We operate a robust PSL where we utilise recruitment agencies to source labour. We only use specified and reputable agencies with set terms of business. We confirm rates of pay for agency workers and employees, separately to any fee due resultant from the recruitment agency's work to source a

candidate. We ensure all recruiters are a member of the Recruitment and Employment Confederation (REC).

Employee handbook and code of conduct:

Our employee handbook makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour during the operation of our business.

Whistleblowing:

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing policy and procedure, 'Speak out', is designed to make it easy for workers to make disclosures, confidentiality and without fear of retaliation.

Training:

All employees are required to undertake mandatory training in modern slavery awareness, to provide knowledge needed to spot the signs of modern slavery and to know what to do if an employee had any modern slavery concerns.

Supplier code of conduct

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

TRANSPARENCY IN OUR SUPPLY CHAINS

We recognise our business is exposed to greater risk when dealing with suppliers, particularly those who have operations/suppliers in other territories.

We have mapped our supply chain and have identified over 400 suppliers for the financial year 2025 to date with a combined spend of over £32 million. We have then focused on key suppliers with spend over £100,000 (making up 99% of our annual supplier spend), which have been mapped according to location, size and industry to identify levels of risk.

Of these:

70% (39% of spend) are located within the UK and 30% (61% of spend) in other low risk countries, with no key suppliers based in territories which we consider to be high risk.

The majority of key suppliers with UK operations we believe have an annual global turnover of >£36m, and are therefore covered by the Modern Slavery Act requirements.

7% of key suppliers are companies we consider to be operating in high-risk sectors.

We collaborate closely with our key suppliers, taking reasonable steps where required, to helping them understand and work towards their own obligations under the Modern Slavery Act. Our own key supplier agreements (used for key strategic suppliers) have been updated to include a commitment to comply with modern slavery legislation, with termination specified as likely outcome of any breach.

DUE DILIGENCE

We undertake due diligence when appointing new suppliers and review existing suppliers. We purchase the majority of products through our German manufacturing parent company. For key strategic third party suppliers the Anti-corruption and the Modern Slavery Act section within our supplier agreement determines that the Third Party Supplier will, and will procure that its officers, employees, agents, sub-contractors and any other persons who perform services for or on behalf of it in connection with the Agreement will:

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- not commit any act or omission which causes or could cause it or Bauder or its employees to breach, or commit an offence under, any applicable laws relating to anti-bribery and/or corruption, including the Bribery Act 2010;
- comply with Bauder's anti-corruption policy as updated from time to time;
- comply with the Modern Slavery Act 2015

In addition we;

- map the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluate the modern slavery and human trafficking risks of each new supplier, outside of our parent company supply chain;
- review aspects of the supply chain based on the supply chain mapping;
- create an annual risk profile for each supplier;
- invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

EMPLOYEE TRAINING

We require all staff within our organisation to complete mandated modern slavery awareness training. This is a fully CPD accredited course, and the training covers:

- what is modern slavery and key legislation
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties;
- what external help is available, for example through the Modern Slavery Helpline

LOOKING FORWARD: KEY PERFORMANCE INDICATORS

Going forward, we aim to work towards:

- All staff both existing and new will have completed our accredited training on modern slavery.
- Developing a procedure to monitor how our suppliers comply with our supplier Code of Conduct.
- We are working to create a recruitment policy to further verify the practices of our partnered recruitment agencies.

APPROVAL

This statement was approved on behalf of our board of directors, who review and update it annually.



Angeline Barnes Chartered FCIPD
HR Director