Modern Slavery Statement

Version 1.0 — March 28th, 2026

Waybook

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1 Introduction & Commitment

Modern Slavery Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Metcor ("Metcor Group Ltd" and any of its subsidiaries) has taken, and continues to take, to ensure that modern slavery and human trafficking are not taking place within our business or our supply chains.

Metcor Group is an environmental services organisation operating across the United Kingdom employing over 500 people. We are committed to acting ethically and with integrity in all our business dealings and relationships. We hold ourselves to the highest standards of corporate conduct and expect the same of all those with whom we work.

Our Position

Modern slavery is a serious crime and a grave violation of fundamental human rights. Metcor has a zero-tolerance approach to modern slavery in any form, whether within our own operations or those of our supply chain partners. Metcor considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

We recognise that as an organisation operating in the environmental services sector, our workforce and supply chains can involve a range of contractors, sub-contractors, and third-party suppliers. We are therefore committed to implementing and enforcing effective systems and controls to identify and address any risk of modern slavery occurring.

Scope

This statement applies to:

- All Metcor employees, regardless of role or seniority
- All contractors and agency workers engaged by Metcor
- All suppliers and sub-contractors within our supply chain

2 Our Business & Supply Chains

Our Business & Supply Chains

Metcor provides environmental services across the United Kingdom. Our operations encompass a broad range of activities and, as such, we engage with a diverse network of suppliers, contractors, and service providers to deliver our work effectively and safely.

Our Operations

Our workforce is predominantly based in the United Kingdom. We employ skilled professionals across a range of disciplines including field operations, technical analysis, project management, and administrative functions. All employees are engaged under contracts of employment that comply fully with UK employment law, including provisions relating to minimum wage, working hours, and rights at work.

Our Supply Chain

Our supply chain includes, but is not limited to:

- Equipment and materials suppliers
- Specialist sub-contractors and field operatives
- Transport and logistics providers
- Facilities and support services We recognise that certain areas of our supply chain may carry a higher risk of modern slavery, particularly where labour-intensive activities are involved or where supply chains extend internationally. We take a risk-based approach to managing these relationships and apply greater scrutiny where elevated risk is identified.

Supplier Expectations

All suppliers engaged by Metcor are expected to uphold the same standards that we hold ourselves to. We communicate our expectations clearly and require that suppliers:

- Comply with all applicable laws relating to employment and human rights
- Do not use forced, compulsory, or trafficked labour
- Ensure workers are employed voluntarily and are free to leave employment
- Pay workers at least the national minimum wage or equivalent We reserve the right to terminate supplier relationships where evidence of non-compliance with these standards is identified.

3 Risk Assessment & Due Diligence

Risk Assessment & Due Diligence

Metcor takes a structured and analytical approach to identifying and managing the risks of modern slavery within our operations and supply chains. We recognise that risk assessment and due diligence are ongoing processes, not one-time activities. In general, Metcor considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Risk Identification

We assess risk across several dimensions, including:

- **Geography** – suppliers or operations based in regions with known human rights risks
- **Sector** – industries historically associated with labour exploitation, such as logistics, cleaning, and waste management
- **Workforce type** – use of agency, seasonal, or migrant labour
- **Supply chain complexity** – long or opaque supply chains with limited visibility Our environmental services activities predominantly operate within the UK, which reduces certain geographic risks. However, we remain vigilant to risks that can arise even in domestic supply chains.

Due Diligence Processes

Our due diligence activities include:

- Pre-qualification screening of new suppliers, incorporating modern slavery and ethical trading criteria
- Contractual obligations requiring suppliers to comply with the Modern Slavery Act 2015 and equivalent legislation
- Periodic review of existing supplier relationships, with enhanced scrutiny applied to higher-risk categories
- Encouraging staff and suppliers to raise concerns through appropriate channels

Continuous Improvement

We are committed to continuously improving our due diligence processes. This includes reviewing our supplier assessment frameworks on a regular basis and updating our approach in line with emerging best practice guidance from government, industry bodies, and civil society organisations.

> Any supplier found to be in breach of our modern slavery requirements will be subject to immediate review, and Metcor reserves the right to terminate the relationship without notice where serious violations are identified.

4 Training & Awareness

Training & Awareness

Metcor recognises that effective prevention of modern slavery requires a well-informed workforce. Raising awareness and building capability across the organisation is a key component of our approach.

Employee Training

All employees are provided with awareness training on modern slavery as part of their induction programme.

Management Responsibilities

Managers and procurement professionals carry particular responsibility for identifying and managing modern slavery risks. Those in these roles receive additional guidance on:

- Conducting supplier due diligence
- Identifying red flags during contract management and site visits
- Escalating concerns appropriately within the organisation

Raising Concerns

Metcor operates a clear and accessible reporting mechanism for employees, contractors, and suppliers to raise concerns about potential modern slavery. Individuals are encouraged to report concerns without fear of retaliation. Reports can be made to line management, HR, or via our confidential reporting channel.

All concerns raised will be taken seriously, investigated promptly, and escalated to relevant authorities where appropriate, including the **National Referral Mechanism (NRM)** and law enforcement agencies.

We are committed to ensuring that no individual suffers any detriment as a result of raising a genuine concern in good faith.

5 Governance & Review

Governance & Review

Metcor's commitment to combating modern slavery is embedded within our broader corporate governance framework. Senior leadership takes direct responsibility for overseeing this statement and the actions that underpin it.

Accountability

Responsibility for this statement and the associated programme of activity sits at senior leadership level. Our leadership team is responsible for:

- Ensuring this statement is reviewed and approved annually
- Overseeing the implementation of due diligence and risk management processes
- Reporting on progress and identifying areas for improvement
- Ensuring adequate resources are allocated to modern slavery prevention activities

Key Performance Indicators

To monitor the effectiveness of our approach, Metcor tracks a number of indicators, including:

- Volume and completion rates of modern slavery training across the workforce
- Number of supplier assessments completed incorporating modern slavery criteria
- Number of concerns raised and outcomes of investigations
- Actions taken in response to identified risks or breaches

Annual Review

This statement is reviewed annually by senior leadership and updated to reflect changes in our operations, supply chains, or the legislative and regulatory environment. The most current version of this statement is published on the Metcor website in accordance with the requirements of the Modern Slavery Act 2015.

Approval

This statement has been approved by the Board of Directors of Metcor and reflects our ongoing commitment to the eradication of modern slavery and human trafficking in all its forms.

> This statement is published in compliance with Section 54 of the Modern Slavery Act 2015 and covers Metcor's financial year activities. It is signed off at Board level and made publicly available.