

## **Anti-Slavery and Human Trafficking Statement**

**Carr's Group plc**

### **Anti-Slavery and Human Trafficking Statement**

**For the financial year ended 2023**

Carr's Group plc ("the Company" or "we") is committed to the sustainable development of its business and to improvement in its management of environmental, social and governance issues. We are opposed to all forms of modern slavery. We take a very firm stance against unethical behaviours, which are managed through a robust framework of controls, including standardised policies and practices, which colleagues are made aware of and provided access to, and which are subject to regular review.

The Company acknowledges its responsibility under the Modern Slavery Act 2015, and will ensure the communication of this responsibility, as well as transparency, within the organisation and within its supply chain. The Company will not support or deal with any business it knows to be involved in slavery or human trafficking.

#### **Our business**

We are an international leader in manufacturing value added products and solutions, with market leading brands in Speciality Agriculture and Engineering, supplying customers around the world. Our Speciality Agriculture division manufactures and supplies feed blocks, minerals and boluses containing trace elements and minerals for livestock. Our Engineering division designs and manufactures pressure vessels, manufactures precision components from specialist steel alloys, manufactures robotic manipulators, and provides engineering design, assembly, and installation services for the nuclear, defence and oil & gas industries. Our group headquarters are in the United Kingdom (UK). We have operations based throughout the UK, as well as Speciality Agriculture and Engineering operations in Germany and the USA.

#### **Policies and training**

We continue to reinforce our ethical approach to doing business. Our policies and practices, supported by training on the issues of modern slavery and human trafficking, ensure that there are systems in place to raise awareness, protect against the risks of slavery and human trafficking, and to provide a means by which colleagues can raise concerns to raise concerns. These include a whistleblowing policy and an independent whistleblowing service "SeeHearSpeakUp" which is available to all colleagues and can be used anonymously. Our anti-slavery and human trafficking policy is accessible to all employees and training takes place at regular intervals. As part of our governance arrangements, the Company has a policy that is clear on our commitments to ensure our supply chain is free of any slavery and human trafficking.

Carr's promotes a culture of integrity and respect, as we continue to embed our Group-wide Code of Ethics, which was launched in 2022 and provided a single message for our people and a clear source of straightforward guidance, supplementing our existing well-developed framework of policies. The Code guides our behaviours and responses on a range of ethical situations which might be encountered at work. All colleagues globally are provided with a copy of the Code (translated where necessary).

#### **Risk assessment, prevention and mitigation**

We continue to consider there to be a low risk of modern slavery and human trafficking within the Company and its supply chain. This is due to the nature of our operations and the types of suppliers we use in our businesses. We remain vigilant and we are aware that the risk of modern slavery appearing in supply chains can increase, particularly as the Company develops and grows.

We recognise that the level of management control required for the review of any imports from sources from outside of the UK, USA and EU is potentially greater than the management control needed for those geographies. We will continue to review and monitor this as part of our risk management approach to an ethical supply chain and have recently engaged a firm of specialist procurement experts to support us in the identification and analysis of this risk.

### **Due diligence and effectiveness**

We are engaging with existing and potential suppliers and distributors in relation to their policies on tackling slavery and human trafficking. As part of our engagement, information is requested from such businesses about their policies and practices and the supply chains in which they operate, with a view to ensuring that members of our supply chains understand their responsibilities and take appropriate steps to mitigate the risk of modern slavery and human trafficking. The supplier due diligence process is subject to regular review including how we engage with suppliers and distributors in relation to tackling slavery and human trafficking.

Regular engagement with our suppliers and distributors is important to our business: this includes site visits in the UK and internationally. These visits and regular contact through calls and virtual meetings enables us to gain an understanding of the supply chain for the raw materials we purchase. Such visits help build sustainable and transparent relationships and provide an opportunity to evaluate our suppliers and distributors own processes and practices. Additionally, they provide an opportunity to evaluate the integrity of our suppliers, enabling us to see how they operate and to assure ourselves that they respect human rights and run their businesses within an ethical framework that is consistent with our values and our Code of Ethics.

The Company will not undertake business with any third parties including suppliers where concerns arise and will accordingly report such circumstances to the relevant authority.

### **Our commitment**

The Company's directors and senior management have responsibility for implementing the Company's antislavery and human trafficking policies and procedures and ensuring that adequate resources (including training) and investment are provided to ensure that slavery and human trafficking is not taking place with the Company or within its supply chain. The Board is ultimately responsible for determining the Group's risk management which includes the risk of slavery and human trafficking within the Company or its supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for our financial year ended 3 September 2022. This statement will be reviewed and updated annually.

**David White**



**Chief Executive Officer**

Approved by the Board on 31<sup>st</sup> January 2024