

At Carr's Group, we are committed to eradicating modern slavery and human trafficking in all its forms from our businesses and supply chains. We are opposed to all forms of modern slavery and will not support or deal with any business we know to be involved in slavery or human trafficking. We have a framework of controls, including standardised policies and practices, which help us manage compliance.

This statement is made pursuant to the provisions of the Modern Slavery Act 2015 and covers the activities and operations of all of our businesses across the globe during the year ended 31 August 2024.

### **Our business**

We are an international leader in manufacturing value added products and solutions, with market leading brands in Agriculture and Engineering, supplying customers around the world. Our Agriculture Division manufactures and sells research proven livestock supplements as feed licks, blocks, bagged minerals and boluses. Our Engineering Division manufactures vessels, precision components and remote handling systems, and provides specialist engineering 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 Agriculture and Engineering operations in Germany and the USA.

Since the end of the reporting period covered by this statement, we have announced that we have agreed a sale of the Engineering Division, a process which we expect to complete in the first half of 2025. A separate sale process is underway for Chirton Engineering, our final engineering business, which was excluded from the larger divisional sale.

### **Policies and training**

We continue to reinforce our ethical approach to doing business. Our policies and practices 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. These include a whistleblowing policy and an independent whistleblowing service, which is available to all colleagues and can be used anonymously.

Our anti-slavery and human trafficking policy is readily available to all employees and clearly sets out our commitments to ensure that our supply chain is free of any slavery and human trafficking.

We continue to embed our Group-wide Code of Ethics, which sets the tone and provides a single message for our people as 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 are provided with a copy of the Code (translated where necessary).

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

Due to the nature of our operations and the types of suppliers we use in our businesses, it remains the case that we consider there to be a low risk of modern slavery and human trafficking within our supply chain. The size of the Company, the geographies in which we are present and the level of management oversight allow us to be confident that modern slavery does not exist within our own organisation. We do, however, remain vigilant, as we are aware that the risk of modern slavery appearing can change, particularly as the Company develops, grows and enters new markets.

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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. Our engaged firm of specialist procurement experts are helping us with the identification and analysis of this risk.

### **Due diligence and effectiveness**

Using the experience and expertise of our retained procurement specialists, we have initially targeted the top suppliers to our Agriculture Division, accounting for around 85% of the total procurement spend in that division. We have issued revised contracts and terms and conditions of purchase to all of those suppliers, which contain a section governing supplier behaviour. These documents contractually oblige each supplier to comply with a range of supply chain legislation, and in particular the Modern Slavery Act 2015, as well as reinforcing the obligation to report to us any breach or suspected failing under that legislation, so that we are able to promptly act on the information received.

As well as pursuing those contractual compliance commitments, we have issued a sustainability questionnaire to each of them, seeking additional clarity and evidence on how they operate their businesses within an ethical framework that is consistent not only with the legislative requirements, but also the values we adopt through our own Code of Ethics. Within that questionnaire is a section on Labour Standards, which probes each supplier's respective compliance approach to modern slavery, soliciting information about the policies and practices and the supply chains in which they operate. We have received a range of responses from those suppliers approached - a team is reviewing the replies to the questions and the suite of documents and policies provided by some of those suppliers. Where required, we expect to reengage with those suppliers once that analysis is completed. We continue to pursue those from whom we received no response.

The Company will not undertake business with any customer or supplier where there is a meaningful concern that modern slavery might be present or arise. Where appropriate, we will report such circumstances to the relevant authorities.

### **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 and investment are provided to provide assurance that slavery and human trafficking is not taking place in our operations or within our broader supply chain. The Board ultimately oversees the management of risk across the Group, which includes the risk of slavery and human trafficking within the Company or its supply chain. This statement will be reviewed and updated annually.



**David White**  
**Chief Executive Officer**

Approved by the Board on 14 February 2025