

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out HARCOM GROUP LTD's actions to eliminate any potential modern slavery risks related to its business. We are dedicated to putting in place steps aimed at ensuring there is no slavery or human trafficking in HARCOM or our supply chains. This statement relates to actions and activities during the financial year 1 October 2024 to 30 September 2025.

Organisational structure

We are a provider of Ductwork systems to numerous work sectors including commercial offices, banking establishments, data centres, education, government buildings, residential infrastructure, retail and pharmaceutical. The labour supplied to HARCOM in pursuance of its operations carried out across the United Kingdom, from our Head Offices in London.

Definitions

HARCOM 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 or 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.

Commitment

HARCOM acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. HARCOM understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

HARCOM does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to HARCOM in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. HARCOM strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and Europe.

Supply chains

HARCOM is committed to ensuring that its 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. HARCOM works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of HARCOM's supplier code of conduct will lead to the termination of the business relationship.

Potential exposure

Global data shows that the Construction industry has a higher exposure to slavery/human trafficking. HARCOM as a service provider within the construction industry has therefore taken this possible exposure to slavery/human seriously and 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.

Steps

HARCOM carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

HARCOM has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, HARCOM has taken the following steps to ensure that modern slavery is not taking place:

- Reviewed our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Included in our quality audits measures to identify and assess the potential risks in its supply chains
- Undertake annual impact assessments of our services upon potential instances of slavery
- Created action plans to address risk to modern slavery

Key performance indicators

HARCOM has set the following key performance indicators (KPI's) to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- requiring all staff to undertake training on modern slavery.
- updating our system for supply chain verification, whereby the HARCOM evaluates potential suppliers
- updating its system for supply chain verification, whereby the HARCOM evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains whereby the HARCOM will re-evaluate all existing suppliers in light of the Modern Slavery Act 2015

Responsibility

Responsibility for HARCOM's anti-slavery initiatives is as follows;

- Policies: People Department
- Risk assessments: Sustainability Department
- Investigations/due diligence: The Chief People Officer is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- Training: Training is delivered by the People Department and QHSE Department to ensure our employees, workers and subcontractors better understand and respond to the identified slavery and human trafficking risks.

Policies

HARCOM has the following policies which further define its stance on modern slavery which clearly stipulates our zero-tolerance policy towards modern slavery.

- **Modern Slavery policy.** We have a comprehensive Modern Slavery policy which stipulates the Organisational processes and procedures and expectation across its supply chain in relation to modern Slavery and human trafficking.
- **Whistleblowing policy.** 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 procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can contact HR to make a confidential disclosure.
- **Employee Code of Conduct.** HARCOM's code makes clear to employees the actions and behaviour expected of them when representing the Organisation. HARCOM strives to maintain the highest standards of employee conduct and ethical behaviour when operating within the UK or abroad and managing its supply chain.
- **Recruitment/Agency workers policy.** HARCOM use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency.
- **Sustainability strategy.** Our Sustainability strategy includes a target to train 100% of our workforce on Modern Slavery and Human Trafficking and audits compliance across the Organisation and supply chain.
- **Any other policies** HARCOM has other relevant policies such as Sustainability Policy, Young Persons Policy, EDI Policy and Ethical Policy. The Modern Slavery Policy must be woven into the fabric of all these other relevant policies, in that they are all to be interpreted within the spirit and intent of this policy. Where there is any inconsistencies or ambiguity between this policy and any other, this policy will prevail.

Training

HARCOM requires all its staff to complete training on modern slavery as a module within the Organisation's wider human rights/ethics/ethical trade training programme.

The Organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- 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 within the organisation;

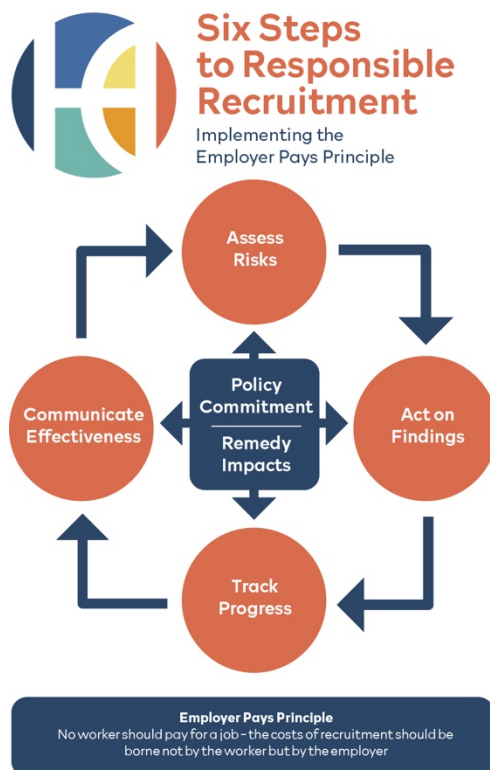
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps HARCOM should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from HARCOM's supply chains.

Awareness-raising programme

As well as training staff, the HARCOM raises awareness of modern slavery issues by circulating a series of emails to staff and its supply chain and publishing articles in its internal communications platforms.

The information circulated explain to staff:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- 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 within our Organisation.
- What steps our organisation should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios, including their removal from our supply chains.



Employers Pay Principle

HARCOM is committed to the Employer Pays Principle that no worker should pay for a job – the costs of recruitment should be borne not by the worker but by the employer. Our commitment which is supported by our procedures ensures that:

- Migrant workers shall not be required to pay for their employment.
- The costs and fees associated with recruitment, travel and processing of migrant workers from their home community to the country of workplace, including through to return when the relocation is not permanent, shall be covered by the employer, where possible.
- The employer should pay the costs of recruitment directly to the extent possible. When not possible, or where the migrant worker is legally required to pay a fee or cost directly, the migrant worker shall be reimbursed by the employer as soon as practicable upon discovery.
- HARCOM will explain how this policy applies to our workforce (employees, agency and contract workers) as well as our expectations of business partners and supply chain.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Approved by the board and signed on their behalf by:



Steve Harrison
Managing Director

17th June 2026

Document Control:

Date:	Author:	Changes:	Approved by:	Version:
17/06/26	Head of Risk & Compliance	1 st Issue	Managing Director	1.0