

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

McQuillan Companies strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

McQuillan Companies expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy. Violations of this policy will be subject to disciplinary measures in accordance with McQuillan Companies Disciplinary Policy and Procedure.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with a Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach and to ensure adherence to these measures, McQuillan Companies will ask all third parties to complete the questionnaires designed to evaluate the implementation of anti-modern slavery practices within our operations and supply chains. We may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with the Code of Conduct.
 - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code of Conduct.
- As part of ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant carrying out audits of suppliers for their compliance with our Code of Conduct.

- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Supporting Our Collaborative Approach to Modern Slavery Act

McQuillan Companies will work in partnership with its supply chain under a collaborative approach which follows a rationalised and coordinated method towards overcoming modern slavery.

This rationalised approach means that modern slavery act obligations and governance are visible to all prospective suppliers that are working in support of McQuillan Companies and / or are tendering for business:

- Pre-qualification and full tender question modern slavery awareness
- Mandated modern slavery supplier terms and conditions

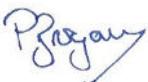
This approach is seen as a key enabler committing us all towards aligned Modern Slavery Act principles whilst adhering to the specific requirements of the Act.

Further information and assistance can be found via the following Modern Slavery Act practical guide:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040283/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf

Review

This policy will be reviewed regularly and may be altered from time to time in light of legislative changes or other prevailing circumstances.



P J Brogan
Managing Director

Date: 27 February 2026