

Modern Slavery and Human Trafficking Policy

Version 3.0

24th February 2025

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Modern Slavery and Human Trafficking Policy

Document Control and Change History

| Document Control | | | | |
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| Revision History | | | | |
| Version | Date | Amendment/Change | Authors (Role) | Approver (Role) |
| 1.0 | 06 th January, 2020 | <ul style="list-style-type: none"> Initial Document | Ato Nimoh-Brema | Mark Smyth (COO) |
| 2.0 | 29 th March, 2021 | <ul style="list-style-type: none"> Annual Review CEOs replaced with CEO Changes to the structure of the organisation Removal of legacy companies within Apogee Group Removal of 'Apogee Group' | Ato Nimoh-Brema | Mark Smyth (COO) |
| 3.0 | 24 th February, 2025 | <ul style="list-style-type: none"> New template / simplified version Change of approver – from COO to CEO Change of owner – QHSE & Sustainability Manager to Head of Sustainability and Business Assurance | Ato Nimoh-Brema | James Clark (CEO) |

Modern Slavery and Human Trafficking Policy

Introduction

Apogee Corporation Limited is committed to preventing modern slavery and human trafficking in all aspects of our business and supply chain. We uphold the highest ethical standards and comply with the UK Modern Slavery Act 2015, ensuring that slavery, forced labour, and human trafficking have no place in our operations.

Scope

This policy applies to all employees, contractors, suppliers, and business partners of Apogee Corporation Limited. It extends to all our global operations, ensuring ethical and lawful business practices throughout our supply chain.

Our Commitment

- We will not engage in or support any form of modern slavery, forced labour, or human trafficking.
- We conduct risk assessments of our business and supply chains to identify and mitigate risks of modern slavery.
- We implement due diligence procedures for onboarding and monitoring suppliers and business partners.
- We ensure compliance with all relevant labour laws and ethical sourcing standards.
- We provide training and awareness to employees and suppliers on modern slavery risks and responsibilities.
- We encourage open reporting of any concerns related to modern slavery, ensuring whistleblowers are protected.

Supply Chain Due Diligence

Apogee Corporation Limited expects all suppliers and partners to adhere to ethical labour practices. We assess suppliers based on:

- Their policies on modern slavery and human rights.
- Their labour conditions and working environments.
- Their compliance with local and international labour laws.
- Their transparency in supply chain management.

Where risks are identified, we work with suppliers to improve conditions or terminate relationships if necessary.

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Training and Awareness

We provide training to employees and relevant stakeholders to recognise and prevent modern slavery. This ensures that all individuals in our business understand their role in identifying and addressing risks.

Reporting and Whistleblowing

Employees, suppliers or stakeholders who suspect or identify cases of modern slavery within our business or supply chain are encouraged to report their concerns confidentially through the whistleblowing procedure or at <https://forms.office.com/e/HkZUCDGyrj>. Reports will be investigated, and appropriate action will be taken.

Monitoring and Compliance

We conduct regular audits and reviews of our supply chain to ensure compliance with this policy

We report annually on our efforts to combat modern slavery in our Modern Slavery Statement, in line with legal requirements. We review and update this policy periodically to enhance our approach.

Approval and Review

This Policy has been endorsed by the Executive Leadership Team and approved by the CEO

Signed

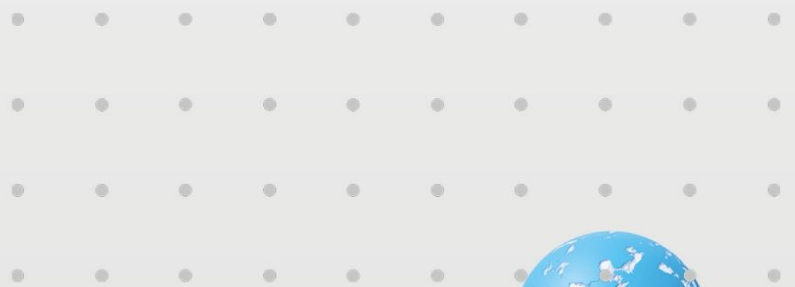


Name: James Clark

Role: CEO

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