



Modern Slavery and Human Trafficking Policy December 2025



1. Definitions and Abbreviations

Apogee Group	Collectively refers to Apogee Corporation Limited and all its subsidiaries and affiliates.
Business Owner:	The designated Apogee employee or department responsible for defining the requirements, overseeing the utilization, and managing the day-to-day relationship with a specific supplier or category of goods/services.
Compliance Obligations:	Mandatory requirements (e.g. applicable legal requirements) and voluntary commitments (e.g., organizational and industry standards, contractual relationships) that Apogee must or chooses to comply with.
Contract:	A legally binding agreement between Apogee and a supplier.
Condoning	To accept, approve of, or give tacit or explicit permission for an act of modern slavery, forced labour, or human trafficking, including through inaction or public statements. This includes expressing support for, or failing to report, such practices.
Due Diligence (Third-Party):	A comprehensive process of research and verification undertaken on potential and existing suppliers to assess their capabilities, financial stability, ethical practices, and compliance with relevant laws, regulations, and Apogee's standards.
ESG (Environmental, Social, and Governance):	A framework used by Apogee to assess and manage its performance across environmental sustainability, social responsibility, and corporate governance.
Forced Labour:	Any work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.
Human Trafficking:	The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.
Integrated Management System (IMS):	Apogee's unified management framework encompassing Quality (ISO 9001), Environmental (ISO 14001), Energy (ISO 50001), Occupational Health & Safety (ISO 45001), and Information Security (ISO 27001).
Modern Slavery:	Encompasses slavery, servitude, forced or compulsory labour, and human trafficking, as defined by the UK Modern Slavery Act 2015.
Procurement Governance Function:	The central governing body responsible for establishing procurement strategy, standards, and oversight across the Apogee Group.
Procurement System:	Apogee's centralised supplier management system, comprising dedicated SharePoint location, used to store and manage supplier information, documentation, performance data, risk assessments, and compliance records.
Shadow Procurement:	The act of procuring goods or services outside of the approved Procurement Governance Function channels and processes.
Supplier:	Any third-party entity or individual providing goods or services to Apogee.
Supplier Code of Conduct:	A document outlining Apogee's ethical, social, environmental, and human rights expectations for all its suppliers.
Supplier Onboarding:	The process of integrating a new supplier into Apogee's systems and processes, including due diligence, contract negotiation, and performance setup.

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Whistleblowing Policy:	Apogee's policy and procedure that provides a mechanism for employees and other stakeholders to report concerns about wrongdoing, including modern slavery, confidentially and without fear of reprisal.
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2. Introduction

2.1. Purpose

Apogee Corporation Limited is unequivocally 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 fully with the UK Modern Slavery Act 2015, ensuring that slavery, forced labour, and human trafficking have no place in our operations or supply chain. The purpose of this policy is to outline our unwavering commitment to these principles, define the responsibilities for their implementation, and ensure all individuals associated with Apogee understand their role in upholding ethical and lawful business practices. This policy is an integral part of our broader Environmental, Social, and Governance (ESG) strategy.

2.2. Scope

This policy applies to all employees, temporary staff, contractors, suppliers, business partners, and other third-party entities of the Apogee Group, including all its subsidiaries and affiliates. It extends to all our global operations, encompassing both direct and indirect procurement activities, and covers the entire lifecycle of our business relationships, from initial engagement through to termination.

2.3. Guiding principles

Apogee's commitment to combating modern slavery and human trafficking is guided by the following core principles:

- **Zero Tolerance:** We have a zero-tolerance approach to modern slavery, forced labour, human trafficking, and any associated unethical labour practices.
- **Ethical Conduct:** We are committed to acting ethically and with integrity in all our business dealings and relationships.
- **Compliance:** We comply with all applicable laws, regulations, and ethical standards, including those related to human rights, labour laws, and anti-slavery legislation.
- **Risk-Based Approach:** We adopt a risk-based approach to identify, assess, and manage modern slavery risks in our operations and supply chains.
- **Transparency:** We strive for transparency in our supply chain management and public reporting on our efforts to combat modern slavery.
- **Continuous Improvement:** We are dedicated to continually improving our practices to identify and mitigate modern slavery risks.

3. Roles and Responsibilities

Effective implementation of this policy requires collaboration and clear delineation of responsibilities across various functions within Apogee Corporation, acknowledging that procurement activities are conducted by various departments under a unified framework.

ESG Group (Chaired by the Chief People Officer – CPO):	<ul style="list-style-type: none"> ● Policy Ownership & Strategic Oversight: Acts as the ultimate owner of this policy. Provides strategic direction and ensures the modern slavery agenda is fully integrated into Apogee's broader ESG strategy and objectives. ● Resource Allocation: Ensures adequate resources are allocated for effective modern slavery risk management and compliance.
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	<ul style="list-style-type: none"> ● Reporting: Reviews overall performance related to modern slavery risks and ensures contributions are captured for corporate responsibility reporting, including the annual Modern Slavery Statement.
Executive Leadership Team (ELT):	<ul style="list-style-type: none"> ● Policy Approval: Reviews and formally approves this Modern Slavery Policy and the annual Modern Slavery Statement. ● Leadership & Culture: Demonstrates visible leadership commitment to combating modern slavery, fostering a culture of ethical conduct and compliance throughout the organisation.
Procurement Governance Function:	<ul style="list-style-type: none"> ● Framework Development: Establishes and maintains the central framework, standards, and guidelines for supplier selection, onboarding, and ongoing management, ensuring modern slavery risks are addressed across all procuring departments. ● Strategic Procurement: Manages procurement activities for complex, high-value, or strategic goods/services that may carry higher modern slavery risks. ● System Management: Owns and maintains Apogee's centralized procurement systems (e.g., Procurement SharePoint) used for supplier information and risk monitoring.
Operational Procurement Teams (e.g., Marketing and Events, Logistics and Warehouse, ODS, Product, Facilities Teams):	<ul style="list-style-type: none"> ● Operational Due Diligence: Responsible for conducting due diligence checks on their respective suppliers as guided by the Procurement Governance Function and Compliance Team. ● Policy Adherence: Ensures all procurement activities comply with this policy and the Apogee Supplier Onboarding and Third-Party Due Diligence Policy & Procedure. ● Risk Identification: Proactively identify and report any suspected modern slavery risks within their specific supply chains or procured services.
People & Culture Department:	<ul style="list-style-type: none"> ● Internal Compliance: Ensures that Apogee's own employment practices are free from modern slavery, forced labour, or human trafficking, adhering to fair recruitment practices, wages, and working conditions. ● Operational Procurement: Responsible for procurement activities specific to human resources functions (e.g. engaging recruitment agencies, procuring HR systems, engaging external legal counsel). ● Compliance Integration: Collaborates closely with the Compliance Team for due diligence related to background checks (e.g., DBS checks managed through recruitment agencies) and legal/regulatory compliance for all HR services and systems. ● Data Security: Works with the IT Security Team to ensure procured HR systems and services handle sensitive employee data securely and in full compliance with data protection laws. ● Reporting Mechanism: Manages the Whistleblowing Policy and process for employees to report concerns. ● Training Coordination: Coordinates and delivers modern slavery awareness training to employees.

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Compliance/Legal Teams:	<ul style="list-style-type: none"> ● Policy Oversight: Ensures this policy and associated procedures are up-to-date and compliant with the UK Modern Slavery Act 2015 and other relevant human rights and anti-slavery legislation. ● Legal Guidance: Provides legal counsel on all aspects of modern slavery risk, due diligence, and contractual clauses. ● Due Diligence Support: Leads and conducts specialized due diligence checks (e.g., AML, PEPs, Sanctions, high-risk human rights assessments) for suppliers and provides training/education on these requirements to operational procurement teams. ● Investigation Support: Supports the investigation of modern slavery concerns or reports.
QHSE Manager	<ul style="list-style-type: none"> ● Risk Assessment: Assists in assessing and mitigating social and human rights risks within the supply chain, including modern slavery indicators, aligning with ISO 45001 principles. ● Technical Guidance: Provides guidance on integrating social and ethical criteria into supplier evaluation.
IT (Business Support) Team	<ul style="list-style-type: none"> ● Information Security Oversight: Ensures procurement processes for IT-related goods and services, or any services involving Apogee's information assets, comply with the requirements of ISO 27001 (Information Security) and data protection laws relevant to modern slavery risk (e.g., data related to worker conditions). ● Technical Guidance: Provides technical guidance on integrating information security requirements into supplier contracts and due diligence. ● Risk Assessment: Assists in assessing and mitigating information security risks associated with suppliers and procured services relevant to modern slavery (e.g., secure handling of worker data).
Finance Team	<ul style="list-style-type: none"> ● Financial Oversight: Ensures financial practices do not inadvertently support modern slavery (e.g., through payment processes that might enable illicit activities). ● Budgeting & Approval: Approves budgets for procurement activities, including those related to modern slavery risk mitigation and compliance.
All Employees:	<ul style="list-style-type: none"> ● Adherence to Policy: All employees must adhere to this policy and Apogee's ethical standards. ● Awareness & Vigilance: Maintain vigilance for indicators of modern slavery and human trafficking in Apogee's operations and supply chains. ● Reporting Concerns: Promptly report any suspected or actual instances of modern slavery through the designated channels (refer to Section 6.1).

4. Policy Requirements

This section outlines the specific requirements and controls to prevent and address modern slavery and human trafficking within Apogee's operations and supply chain.

4.1. Risk Assessment and Management

- Apogee conducts regular risk assessments of its business operations and supply chains to identify areas with a higher potential for modern slavery and human trafficking. This assessment considers

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factors such as geographical location of suppliers, nature of goods/services, and industry sector, utilising a risk-based approach.

- Identified risks will be prioritised, and appropriate mitigation actions will be developed and implemented to reduce exposure.

4.2. Supply Chain Due Diligence and Onboarding

- All Apogee departments engaged in procurement activities must ensure that new and existing suppliers undergo appropriate due diligence processes, proportionate to their assessed risk level.
- This due diligence includes assessing the supplier's commitment to and compliance with ethical labour practices, human rights, and the prevention of modern slavery. It leverages the detailed processes outlined in the Apogee Supplier Onboarding and Third-Party Due Diligence Policy & Procedure.
- Suppliers are assessed on factors including: their policies on modern slavery and human rights; their labour conditions and working environments; their compliance with local and international labour laws; and their transparency in supply chain management.

4.3. Supplier Adherence and Contractual Requirements

- All suppliers are expected to adhere to the Apogee Supplier Code of Conduct, which explicitly prohibits modern slavery, forced labour, and child labour, and sets out expectations for fair wages and working conditions.
- Our contracts with suppliers will include clauses requiring their compliance with the Modern Slavery Act 2015 and other relevant human rights and labour laws, and adherence to our Supplier Code of Conduct.
- Where risks are identified, we will work collaboratively with suppliers to improve conditions. However, non-compliance with our ethical standards or a refusal to take corrective action may lead to the termination of the relationship.

4.4. Training and Awareness

- Apogee provides training and awareness programs to relevant employees and stakeholders to enhance their understanding of modern slavery risks, indicators, and their responsibilities under this policy. This includes targeted training for procurement-active teams, Human Resources, and relevant managers.
- Under our Supplier Code of Conduct, we require all business partners and suppliers to provide regular and relevant training to their employees and sub-suppliers on modern slavery risks and ethical labour practices.

4.5. Reporting and Whistleblowing

- Employees, suppliers, or other stakeholders who suspect or identify cases of modern slavery within Apogee's business or supply chain are strongly encouraged to report their concerns confidentially.
- Concerns can be reported through Apogee's Whistleblowing Policy and Procedure or directly via the designated confidential reporting channels.
- All reports will be treated with confidentiality, investigated promptly and thoroughly, and appropriate action will be taken. Individuals reporting concerns in good faith will be protected from victimisation.

4.6. Monitoring and Compliance

- Apogee conducts regular audits and reviews of its operations and supply chain to monitor compliance with this policy and the Supplier Code of Conduct. The frequency and depth of monitoring are determined by the assessed risk level of the supplier or operational area.
- We aim to embed modern slavery considerations into existing supplier performance management processes.

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- Any identified instances of non-compliance will be subject to appropriate remediation action (refer to Section 5.3).

5. Consequences

Non-compliance with this Modern Slavery Policy can result in serious consequences for both employees and suppliers, as defined within Apogee's overarching Disciplinary and Contractual frameworks.

5.1. Business Consequences

- Legal Action & Financial Penalties:** Failure to comply with the Modern Slavery Act 2015 can lead to significant legal and financial penalties, including potential unlimited fines and criminal prosecution.
- Reputational Damage:** Engagement with unethical suppliers or a failure to adequately address modern slavery risks can severely damage Apogee's brand image, stakeholder trust, and public perception.
- Operational Disruption:** Supply chain disruptions may occur due to identified modern slavery issues, impacting business continuity.
- Loss of Business:** Failure to demonstrate compliance and ethical sourcing may lead to loss of existing clients and inability to secure new contracts, particularly with organizations committed to ethical supply chains.

5.2. Individual Consequences

- Disciplinary Action:** Any employee found to be in non-compliance with this policy, including engaging in or Condoning modern slavery, forced labour, or human trafficking, will face severe disciplinary action up to and including immediate termination of employment.
- Legal Action:** Potential personal legal liability and criminal prosecution if involved in, or having knowledge of, modern slavery without reporting.
- Victimisation:** Victimisation of individuals making a complaint in good faith will result in disciplinary action.

5.3. Supplier Consequences

- Contractual Breach:** Non-compliance may result in a breach of contract, leading to remedies such as corrective action plans, suspension of business, or immediate contractual termination.
- Disqualification:** Suppliers found in non-compliance will be disqualified from future business opportunities with Apogee.
- Legal Action:** Potential legal action if violations involve criminal activity.

6. Reporting and Policy Review

6.1. Monitoring and Reporting

Apogee is committed to continuously monitoring the effectiveness of its modern slavery risk management efforts. This includes:

- Risk Assessment Updates:** Regular review and update of the modern slavery risk assessment for operations and supply chains.
- Due Diligence Effectiveness:** Monitoring the completion and outcomes of supplier due diligence checks for all suppliers, especially high-risk ones.
- Training Completion:** Tracking the completion rates of modern slavery awareness training for relevant employees.
- Concerns Reporting:** Monitoring the number and nature of modern slavery concerns raised through whistleblowing or other channels, and the outcomes of investigations.

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- **Key Performance Indicators (KPIs):** Developing and tracking specific KPIs to measure the effectiveness of our modern slavery efforts, contributing to our annual Modern Slavery Statement.
- **Annual Statement:** Compiling and reporting on our efforts to combat modern slavery annually in our Modern Slavery Statement, in line with legal requirements.

6.2. Policy Review

This policy will undergo a formal review by the **ESG Group (as policy owner)** and the **Compliance/Legal Teams** on an **annual basis**. Reviews may also occur sooner if there are significant changes to relevant legislation (e.g. UK Modern Slavery Act amendments), industry best practices, Apogee’s operations, or identified modern slavery risks. The review process ensures the policy’s continued suitability, adequacy, and effectiveness in preventing modern slavery and human trafficking.

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Appendix: Indicators of Modern Slavery

This appendix provides a brief overview of potential indicators or "red flags" that employees should be vigilant for within Apogee's operations, supply chains, or when interacting with third parties. Recognising these signs does not confirm modern slavery, but it should prompt concern and reporting.

Remember: Do NOT attempt to intervene directly if you suspect modern slavery. Your safety and the safety of the individual is paramount. Report your concerns immediately through the designated channels outlined in Section 4.5.

Common Indicators to Look Out For:

1. Physical Appearance and Condition:	<ul style="list-style-type: none"> Signs of physical abuse (e.g. injuries, untreated medical conditions). Appearing unkempt, malnourished, or having poor hygiene. Wearing the same clothes repeatedly or inappropriate clothing for the work/weather.
2. Isolation and Control:	<ul style="list-style-type: none"> Appearing withdrawn, fearful, or hesitant to make eye contact. Rarely being allowed to travel or move independently. Living in overcrowded, unsanitary, or unsafe accommodation, often provided by the employer. Having no personal documents (passport, ID, phone) or having them held by someone else. Being isolated from family, friends, or the wider community.
3. Poor Working/Living Conditions:	<ul style="list-style-type: none"> Working excessively long hours or unusual hours without breaks or days off. Living at the place of work or in accommodation that seems unsafe or unsuitable. Having little or no personal possessions. Working in unsafe or unhealthy conditions without adequate safety equipment or training.
4. Financial Exploitation:	<ul style="list-style-type: none"> Showing signs of financial control (e.g. not having access to their own wages, wages being paid into another person's account). Complaining about large debts or excessive deductions from their pay. Having very little money despite working long hours.
5. Fear and Reluctance:	<ul style="list-style-type: none"> Seeming fearful, anxious, or depressed. Appearing coached or hesitant to speak freely in front of others. Reluctance to seek help or accept assistance. Expressing fear of authorities.
6. Supervisory/Management Behaviour:	<ul style="list-style-type: none"> An individual (often a supervisor or manager) acting in a highly controlling or aggressive manner towards the worker. Someone else speaking on behalf of the worker, controlling their communication.

If you observe any of these indicators, please report your concerns immediately and confidentially through the channels outlined in Section 4.5 of this policy.

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