

## MODERN SLAVERY STATEMENT OF CARCLO FOR THE FINANCIAL YEAR ENDED 31 MARCH 2025

### Introduction

Carclo plc ("Carclo") and its relevant UK group subsidiaries\* are determinedly committed to upholding the principles of the Modern Slavery Act 2015 ("Modern Slavery"). This statement, published in accordance with Section 54 of the Act, outlines Carclo's firm stance against modern slavery and human trafficking, serving as a testament to our dedication in combating illegal practices.

### Our Business & Supply Chains

Carclo operates globally, specialising in the manufacturing of fine tolerance injection molded plastic parts, primarily for the medical and optics sectors, along with being a prominent supplier of aviation control cables in Europe. Our operations span across various countries, including the United Kingdom, United States of America, China, India, Czech Republic, and France.

With a diverse product range and extensive supplier network, Carclo acknowledges the importance of safeguarding ethical practices throughout its supply chains, engaging suppliers in the implementation of modern slavery policies, fostering collaboration and transparency.

### Group-Wide Policies & Governance

Carclo maintains a suite of group-wide policies aimed at addressing modern slavery and human trafficking. Key policies include:

- **Modern Slavery and Human Trafficking:** Outlining our commitment to combating modern slavery, human trafficking, prohibiting forced or child labour and preventing human rights abuses, contributing to legal compliance, reputational enhancement, stakeholder trust and sustainable business practices
- **Whistleblowing:** Providing a mechanism for workers, suppliers and other stakeholders to report unethical behaviour, fraud, malpractice, non-compliance with ethical standards or other misconduct, safeguarding confidentiality and protection for whistleblowers while contributing to a positive corporate culture, legal compliance and long-term sustainability
- **Anti-Bribery and Corruption:** Enhancing trust and credibility in our business relationships with customers, suppliers, partners and other stakeholders, reinforcing Carclo's ethical values and integrity

### **Adopted Measures Addressing Modern Slavery Risk**

Across global operations, Carclo implements processes and procedures aimed to prevent modern slavery and human trafficking, supporting legal and regulatory compliance. These efforts include:

- **Supplier Audits and Risk Assessments:** Conducted generally on an annual basis or more frequently in high-risk countries or where a supplier has an overall low score, to verify compliance with our policies and ethical standards including but not limited to quality management and health and safety. Findings from these audits guide the CTP Division's evaluation of risk and influence the decision regarding collaboration with a given supplier. Equally, the Specialty Division suppliers adhere to quality management standards specific to the aerospace industry, incorporating within the annual evaluation of suppliers and as part of EN9100 certification process, a section on ethical conduct.
- **Comprehensive Induction Processes:** Familiarising new colleagues with our policies
- **Training Workshops:** Enhancing awareness of legal red flags and regulatory compliance among our workforce, fostering collaboration and innovation
- **Ethical Supply Chains:** Ensuring transparency and accountability, including active supplier engagement to support human rights and compliance with relevant regulation
- **Community Engagement:** Investing in and supporting communities where we operate through initiatives such as scholarships, apprenticeships, and charitable partnerships. These efforts have contributed to reducing vulnerability to exploitation and supporting long-term sustainable development

### **Reporting Concerns**

Carclo maintains a confidential whistleblowing process accessible to employees, agents, contractors, suppliers and customers. This process facilitates the reporting of concerns related to modern slavery or other ethical breaches.

### **Certifications and Further Enhancements**

Carclo has been awarded a bronze medal by EcoVadis, based on Carclo's sustainability management and advanced approach to Corporate Social Responsibility, demonstrating Carclo's high standards on environmental, social and ethical performance in areas such as environmental impact, labour & human rights practices, ethics and sustainable procurement. In addition, the Specialty Division has achieved accreditation EN9100, confirming compliance with quality management standards within the aerospace industry.

Carclo is pleased to confirm that during 2025 there have been no reported or identified instances of modern slavery within our business or supply chains, and we maintain confidence in our ability to effectively address any instances that may be identified through our regular business operations,

exerting every effort to further awareness of modern slavery and human trafficking among our colleagues, customers, partners and other stakeholders.

### **Conclusion**

Carclo remains committed to upholding best practice principles in the prevention of modern slavery and human trafficking within its operations and supply chains. We will continue to raise awareness, engage with stakeholders, and strengthen our procedures to ensure compliance with relevant legal and regulatory requirements.

This statement is endorsed by the Board of Carclo plc and its relevant subsidiaries, underscoring our collective resolve in upholding human rights and ethical standards.

A handwritten signature in black ink, appearing to read "Frank Doorenbosch".

**Frank Doorenbosch**  
Chief Executive Officer  
Carclo plc  
10 September 2025

*\*For 2025, all relevant, active UK subsidiary companies according to the requirements of the Modern Slavery Act 2015 comprise Carclo plc, Specialty Division and CTP Division.*