

AEROSPHERES (UK) LTD

Modern Slavery Policy

1. Policy Statement

Modern slavery is a criminal offence and a breach of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking, each involving the deprivation of a person's liberty by another for personal or commercial gain.

Aerospheres (UK) Ltd ("the Company") is committed to acting ethically and with integrity in all business dealings and relationships, and to maintaining systems and controls intended to help ensure that modern slavery is not taking place in its own business or its supply chains.

The Company is also committed to transparency in its business and in its approach to tackling modern slavery throughout its supply chain, and expects the same standards from all contractors, suppliers and other business partners. As part of its contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and expects suppliers to hold their own suppliers to the same standards.

2. Legislative Framework

This policy is made with reference to the Modern Slavery Act 2015 ("the Act"), in particular Sections 1 and 2 (which create offences relating to slavery, servitude, forced or compulsory labour, and human trafficking) and Section 54 (transparency in supply chains).

This policy also operates alongside other applicable UK legislation, including the Human Rights Act 1998, the Equality Act 2010, the National Minimum Wage Act 1998, and the Immigration Act 2016 (in connection with the role of the Gangmasters and Labour Abuse Authority).

3. Scope

This policy applies to all persons working for the Company or on its behalf, in any capacity, including employees at all levels, directors, officers, agency and seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and the Company may amend it at any time.

4. Our Business and Supply Chains

Aerospheres (UK) Ltd sources goods and services from suppliers and subcontractors in the UK and internationally. The Company recognises that certain sectors and locations carry a higher risk of modern slavery and takes this into account when assessing its supply chains.

5. Responsibility for the Policy

Management at all levels are responsible for ensuring this policy complies with the Company's legal and ethical obligations, and that all those under their control comply with it.

Management at all levels have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and reviewing internal controls and procedures to help counter modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and receive any training required.

6. Due Diligence and Risk Assessment

The Company carries out due diligence on new suppliers and periodically reviews existing ones, taking into account sector, geographic and business-model risk factors. Where concerns arise, the Company will work with the supplier to address them and, where necessary, review the relationship.

7. Compliance and Raising Concerns

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chain is the responsibility of all those working for the Company or under its control. Staff are asked to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff who believe or suspect that a conflict with this policy has occurred, or may occur, should notify their manager as soon as possible, or raise the matter under the QP3 Anti-Bribery & Corruption Policy, which also covers the reporting of concerns of this kind.

If staff are unsure whether a particular act, the treatment of workers more generally, or working conditions within any tier of the supply chain amounts to a form of modern slavery, they should raise it with their manager.

The Company aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if it later proves to be mistaken, and aims to ensure no one is treated unfavourably as a result of reporting such a concern in good faith. Anyone who believes they have experienced such treatment should inform their manager.

8. Training and Communication

Training on this policy, and on the risks the Company's business faces from modern slavery in its supply chain, is provided where needed, particularly to staff involved in procurement and supplier management.

The Company's approach to modern slavery is communicated to suppliers, contractors and business partners at the outset of the business relationship and reinforced as appropriate thereafter.

9. Breaches of this Policy

An employee who breaches this policy may be subject to disciplinary action. The Company may also end its relationship with other individuals or organisations working on its behalf where they breach this policy.

10. Approval, Publication and Review

The Company's turnover meets the threshold prescribed under Section 54 of the Act, and this document is prepared as the Company's slavery and human trafficking statement for the relevant financial year in accordance with that section.

This statement has been approved by the Company's board of directors and is signed by a director below. It is published on the Company's website, with a link in a prominent place on the homepage, and is reviewed and updated at least annually to reflect changes in the Company's business, supply chains, or the requirements of the Act.

11. Related Documents

This policy should be read together with:

- QP13 – Corporate & Social Responsibility Policy
- QP3 – Anti-Bribery & Corruption Policy
- EMS03 – Environmental Policy
- QP9 – Ethical Policy
- Aerospheres Employee Handbook

Signed and Approved:



Paul Thompson – Chief Executive Officer

Date: 7th August 2026