

# UK Modern Slavery Act STATEMENT FOR THE FINANCIAL YEAR 2024

June 2025

# ▶ About this report

This statement is part of the UK *Modern Slavery Act 2015* (hereinafter the "Act"), in accordance with section 54(1). Kersia Group has several commercial organisations operating in the UK with an annual turnover in excess of £36m, and therefore, is subject to the Act. This statement is a joint statement for its entities located in the UK, Holchem Laboratories Limited and Kilco (International) Limited (hereinafter "Kersia UK").

The Group is also subject to reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for its Canada-based subsidiaries.

This statement relates to the actions and activities taken to identify and prevent all modern slavery and human trafficking in our own operations and supply chains during the financial year 01 January 2024 to 31 December 2024. We understand our responsibilities and are committed to making every effort to ensure the protection of individuals and the realisation of their rights, as well as to establish and maintain ethical working conditions. We strive to protect the people who work for Kersia, whether directly or indirectly, on a permanent or temporary basis, from these risks.

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# 1. Organisational structure, business and supply chains

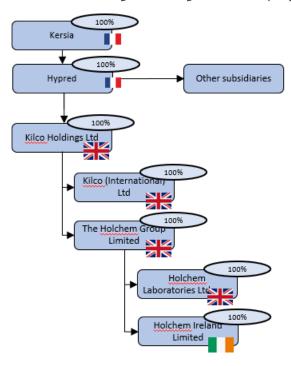
The group specialises in food safety, providing hygiene solutions for the food, agriculture, catering and beverage sectors. More specifically, our product portfolio encompasses hygiene in dairy, pig and poultry farming, hygiene in the food industry and catering, hand hygiene, hygiene in hospitals and water treatment. Our main mission is to ensure food safety "from farm to fork" and to prevent contamination and disease in animals and humans. We therefore develop cleaning solutions, disinfectants and water treatment products. We also provide tailor-made support services based on our scientific expertise and knowledge of the field.

Today, Kersia has become a leading supplier worldwide.



Numbers for the 2024 financial year

The English entities are part of this whole and are helping to create a safer food world. Consistently reviewing and developing new products, technical solutions and systems that can



reduce cost and increase efficiency for its customers, the business has grown to become a leading supplier of hygiene solutions across the UK and Ireland. Kersia UK continues to deliver hygiene solutions through technology and an unparalleled commitment to service levels.

Holchem laboratories limited, headquartered in Bury, develops hygiene and disinfection solutions for a wide range of markets, including food processing, foodservice and facilities, brewery and beverage, and dairy processing. It also provides support services.

Kilco (International) Limited, based in Newtownabbey, also develops hygiene and disinfection solutions, but focuses on the Farm sector (covers dairy, beef, sheep, poultry, and pigs).

Covering every individual process step of supply, from innovation to marketing and including production, our supply chain ensures high quality raw materials, labels and packaging. We include within our supply chain, hardware and software for information technology, consumables, and other services from suppliers based all over the globe. Regarding raw materials it uses in its formulations, wherever possible, Kersia UK locally sources them, with many of them such as caustic soda, sodium hypochlorite and quaternary ammonium

compounds sourced within the North-West of England where one of the production facilities are based.

Good supply chain management is important to meet the needs of our business. This is done by our English team, in coordination with the parent company's team. There is in fact a division between operational purchasing (locally) and strategic purchasing (by the Group's Purchasing Department). The parent company's team will provide guidelines for supply chain management, whilst the local team will run the day-to-day operations independently.

Supply chains can involve risks of forced labour, child labour, modern slavery and human trafficking if they are poorly managed. In this context, we have put in place policies and due diligence processes to limit these risks.

# 2. Organisational policies

#### 2.1. Values

Our activities are based on four values: Transparency, Sharing, Proficiency and Foresight. These values reflect the professional ethics that guide our daily actions, as well as our behaviour towards our colleagues and, more generally, towards all our stakeholders. Kersia attaches significant importance to Compliance as part of its Corporate Social Responsibility approach, which goes beyond regulatory requirements.

#### 2.2. Policies

Kersia group's conviction is that all activities must be conducted with respect for human beings and their dignity. In that sense, the Group respects and promotes human rights as defined specifically in the United Nations Universal Declaration of Human Rights, and in accordance with the United Nations Guiding Principles on Business and Human Rights, among its employees and other stakeholders. The Group pays particular attention to prohibiting child labour and forced labour, in accordance with applicable local regulations and as a minimum in compliance with the standards adopted by the International Labour Organisation as specified in Convention 138 on the minimum age for admission to employment, Convention 182 on the worst forms of child labour, and Convention 29 on forced labour.

Kersia group promotes its commitment to human rights through its ethics policies and procedures, in particular the following:

- The <u>Code of Ethics</u> is a general document that sets out the basic principles and minimum rules to be respected, as well as the standards of professional conduct to which we must adhere in the course of our activities all over the world. This document affirms Kersia's commitment to human rights and the protection of the individual, notably on page 6:

"The Group respects and promotes human rights, as defined in the United Nations Universal Declaration of Human Rights, among its employees and all persons with whom it has a relationship (customers, suppliers, partners, etc.), and in accordance with the United Nations Guidelines concerning companies and human rights. All activities must be conducted with respect for human beings and their dignity.

The Group pays particular attention to the prohibition of child labour in all its forms, as well as forced labour, in compliance with applicable local regulations and, as a minimum, to the standards adopted by the International Labour Organisation (ILO) as specified in ILO Convention No.138, Minimum Age, Convention No.182, Worst Forms of Child Labour, and Convention No.29, Forced Labour.

It is the duty of all employees to respect human rights and ensure that their actions do not infringe the rights of others. Our commitments in terms of human rights extend to all our activities and our value chain. Anyone, whether Group employees or third parties, is invited to notify any violation of these rights of which they are aware.

"Respecting people" is one of the pillars of the Group's commitments, as set out in the Code of Ethics. Available in 20 languages, this code applies to all employees and managers, regardless of their employment status – permanent or casual (employee, temporary staff, trainee, etc.). It also covers its activities with third parties (subcontractors, suppliers, external service providers, public authorities, professional associations, etc). It also provides a mechanism for reporting ethical or legal breaches. Issued in 2019 the Code of Ethics has been updated in 2023, to comply with regulatory changes and clarify some of Kersia's commitments.

- The <u>Supplier Charter</u> sets out our expectations and the commitments to which suppliers must adhere with regard to ethics, including respect for human rights. We are committed to conducting our business with integrity and we expect our partners to do the same:

"The Kersia Group is committed to respecting people and is vigilant about the impact of its activities on them. The Group expects its suppliers to show equal commitment:

- to respect human rights, in particular the United Nations Universal Declaration of Human Rights and the international standards of the ILO, to promote them in their supply chain, and not to be complicit in the violation of these rights. In particular, the Kersia Group expects its suppliers to commit to:
  - o prohibiting child labour and forced and compulsory labour,
  - acting to ensure the health, safety and security of employees and third parties.
- Promoting well-being within the company (working conditions, diversity, non-discrimination, absence of harassment, professional equality, social dialogue, employee fulfilment, etc.)."

The Charter was last updated in 2023. It is shared with the various suppliers, the aim being to get them to sign the Charter. The priority here remains on all tier 1 suppliers. If they refuse to do so, because they do not wish to respond to requests on this subject from all their customers, these suppliers share their own Charter in return. In this case, the Group's Purchasing Department checks that the general terms are in line with our own.

- The aim of the <u>Non-Discrimination Charter</u> is to protect employees, as well as all applicants, from discriminatory behaviour and to promote equality, diversity and inclusion. It was issued in 2023 and has been signed by all the Group's managers and human resources staff.

The <u>Whistleblowing Procedure</u> and the <u>User Guide</u> to the whistleblowing system are designed to inform the Group's stakeholders of the channels available to them to report any breaches of the Group's ethical rules, including the rules on forced labour and child labour. These documents also explain how the whistleblowing platform set up by Kersia works, how the alert will be handled, and they will inform whistleblowers of the specific protection available to them. Issued in 2019, those documents have been updated in 2023.

Kersia UK also implemented complementary local policies, including:

- Anti-harassment & Bullying Policy
- Equal Opportunities Policy
- Slavery & Human Trafficking Statement

# 3. Due diligence in relation to modern slavery

Various due diligence measures have been implemented over the years to limit human rights violation in our activities and supply chains, including modern slavery and human trafficking.

Kersia UK ensure its own compliance by regularly conducting audits of its own manufacturing premises, participating in group-wide compliance. In order to assess its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chain, Kersia UK has a schedule of planned internal audits. In addition, Kersia UK is a member of Sedex, which is one of the world's leading online platforms for sustainability assessment. It focuses mainly on ethical trade and responsible sourcing with emphasis on transparency and working conditions in global supply chains. It provides practical tools, services and a community network to help businesses improve their responsible and sustainable business practices, and source responsibly. In that sense, Kersia UK has carried out its own Self-Assessment in line with Sedex requirements and as a consequence, monitor its progress (currently categorized as "Advanced" with a rating of 4/5 regarding management controls) to meet the SMETA requirements and to ensure that we continue to comply with our legal and moral obligations.

In addition, we carry out several checks on our partners as the group believes in working with partners who conduct their business ethically. All suppliers must indeed undertake to comply with regulations and with the provisions of our Code of Ethics. Where possible, Kersia UK will also work with its suppliers to ensure that they understand their obligations and our requirements to ensure that there are no instances of slavery or coercion within the supply chain. New suppliers are visited to ensure that conditions at site are consistent with UK legislation for safety, environment and working conditions.

More specifically, to ensure a global monitoring of suppliers and do sustainable purchase, the group is working on deploying Ecovadis in the whole group, including the UK. Ecovadis is also one of the leading online platforms for sustainability assessment. It provides sustainability ratings on four topics: environment, labor and human rights, ethics, and sustainable procurement. Information related to modern slavery is also taken into account. Depending on

information and documentation provided regarding measures taken on those topics, Ecovadis will provide a rating. Kersia plans on using this tool to follow-up on its suppliers' commitments. This will participate in our supply chain transparency. For now, the group is focusing on implementing this tool in Europe. So far, all major suppliers, including Holchem and Kilco's major suppliers, have been entered in Ecovadis. Overall, the average rating is 60.9/100, which +9.8 compared with benchmark in our sector. The goal is of course to have all suppliers entered in Ecovadis, so we will continue to work on entering suppliers that have already been rated by Ecovadis. The next step will be to work on asking other suppliers to be rated by Ecovadis and to request corrective actions from the suppliers will low results, including in case of lack of measures to prevent and fight modern slavery.

Moreover, as part of our initiative to identify, monitor and mitigate risks, we have implemented a third-party assessment tool called RiskRate (published by Navex Global UK Ltd) to check the compliance of all partners working with Kersia Group subsidiaries and then monitor them to stay up to date with any changes to their situation. This makes it possible to protect, advise and anticipate the occurrence of a risk that could have adverse consequences for the Group. In particular, we check whether our partners are suspected of or have been convicted of certain crimes or offences, including slavery, compulsory labour and human trafficking and, more generally, any violation of human rights. When forced labour, child labour or human rights violations, or any other behaviour that does not comply with our Code of Ethics, is identified in our supply chains, the Group's Legal & Compliance department carries out an analysis of the situation, which is then forwarded to the Group Executive Committee for a final decision on how to proceed with the relationship with the third party concerned. If the facts are true, we work with our partners to address concerns as quickly as possible. We also reserve the right to terminate any commercial relationship with a company that does not comply with our rules and policies. Today, 85% of the Group's customers and 50% of its raw material suppliers are analyzed by our third-party assessment tool. We intend to improve these figures with the implementation of the new ERP shared by all Group subsidiaries.

Finally, we may also receive reports of human rights violations through our whistleblowing system, implemented in 2019, and available in 20 languages. All employees, as well as all stakeholders, have indeed the opportunity to make a report via the Whistle B platform (provided by Navex Global UK Ltd), which enables whistleblowers to report incidents in complete confidentiality. In this case, the report is received by the members of the Ethics Committee, who will conduct an investigation to ensure that the facts are true, qualify them and take appropriate measures if necessary. Employees also have the option of alerting a line manager, a member of Human Resources, a staff representative or, more generally, any work colleague. It can be noted that Kersia pays particular attention to the protection of whistleblowers, who may not be sanctioned or suffer reprisals for reporting in good faith.

# 4. Assessing and managing our risks

Kersia has zero tolerance to slavery and human trafficking. The welfare of our workforce is crucial for our continued success, and we will not tolerate forced labour (including human

trafficking) or child labour in our operations within any part of our group or supply chains. However, we acknowledge that our supply chains may involve risks of forced labour, child labour, modern slavery and human trafficking. The main risks are not so much at the production stage of our products, where very little work is outsourced and the majority of it takes place in the UK, where the risks of forced labour and child labour are lower. Moreover, Kersia UK tries as much as possible to source its raw materials locally. Therefore, our supply chains are most vulnerable when it comes to sourcing raw materials, hardware and software for information technology, consumables, and other services from suppliers from all over the globe. The Group is aware of the issues and is taking steps to assess and manage these risks as effectively as possible.

To improve prevention of risks regarding slavery and human trafficking, we have completed a human rights risk map in 2024. 206 employees and 16 stakeholders were surveyed in order to build this new risk map. The results of this mapping exercise will be unveiled in the course of the year 2025 and will give us a clearer picture of the risks that our activities and supply chains are likely to cause to human rights, particularly with regard to forced labour, child labour, modern slavery and human trafficking. An action plan to address the new risks identified will then be established: we will be able to strengthen existing measures and, if necessary, put in place new mechanisms to reinforce the protection of human rights.

In addition, as mentioned in the previous section, Kersia carries out an ongoing assessment of its third parties, thereby making it possible to limit the risks of doing business with a third-party employing children or implementing practices that could amount to forced labour.

# 5. Training

For the moment, we have not implemented any training on the subject of forced labour, child labour, modern slavery and human trafficking. However, information regarding slavery and human trafficking is given to staff during induction training. Moreover, raising employees' awareness of this issue is part of a wider process of raising awareness of ethics. It is implemented through internal communications, both by email and on the group's social network (Viva Engage). For example, a communication is produced each year for International Human Rights Day to underline the Group's commitment to human rights.

# 6. Monitoring and evaluation: understanding and demonstrating effectiveness

We have not yet carried out monitoring of the effectiveness of measures to limit the risks of forced labour, child labour, modern slavery and human trafficking. However, the human rights risk map conducted in 2024 will give us a more accurate picture of the risks associated with forced labour, child labour, modern slavery and human trafficking within our Group and our supply chains, and will therefore enable us to strengthen all the resources deployed to combat such practices. The results will be shared in 2025.

In addition, any report, whether by a whistleblower or via the third-party evaluation platform, will be followed by an investigation to assess whether the report is true. We have not received any reports of concerns in relation to slavery or human trafficking within our group or supply chain in the last financial year.

Finally, we are continually seeking to improve our knowledge of the subject so that we can evaluate and improve our processes, thereby strengthening our commitment to the fight against forced labour and child labour.

# Approval

In accordance with the requirements of the Act, and in particular Section 54(6) thereof, this statement has been approved by the Board of Directors of Holchem laboratories limited and Kilco (international) limited.

This statement is signed on behalf of Kersia by Stuart Middleton, Managing Director, in June 2025.

Stuart MIDDLETON

DocuSigned by:

Managing Director

