

MODERN SLAVERY STATEMENT OF CARCLO FOR THE FINANCIAL YEAR ENDED 31 MARCH 2024

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 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, specializing 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 acknowledge 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 combatting 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:

- **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
- **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

The findings from these audits, guide the CTP Division evaluation of risk and influence the decision regarding collaboration with a given supplier. Equally, the Aerospace 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.

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

During 2023, 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.

The Aerospace Division has achieved accreditation against EN9100, signifying adherence to quality management standards within the aerospace industry.

Carclo is pleased to confirm that during 2023 there have been no 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 furthering awareness of modern slavery and human trafficking among our colleagues, customers, partners and other stakeholders.

Conclusion

Carclo's vigilance and dedication to upholding best practice principles on modern slavery and human trafficking within its operations and supply chains remain steadfast. We strive to raise awareness, collaborate with stakeholders and evolve our strategies in the ongoing fight against illegal practices.

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.



Frank Doorenbosch
Chief Executive Officer
Carclo plc
5 September 2024

**for 2024, all relevant, active UK subsidiary companies according to the requirements of the Modern Slavery Act 2015 comprise of Carclo plc, Bruntons Aero Products Limited, Carclo Technical Plastics Limited*