



leadec

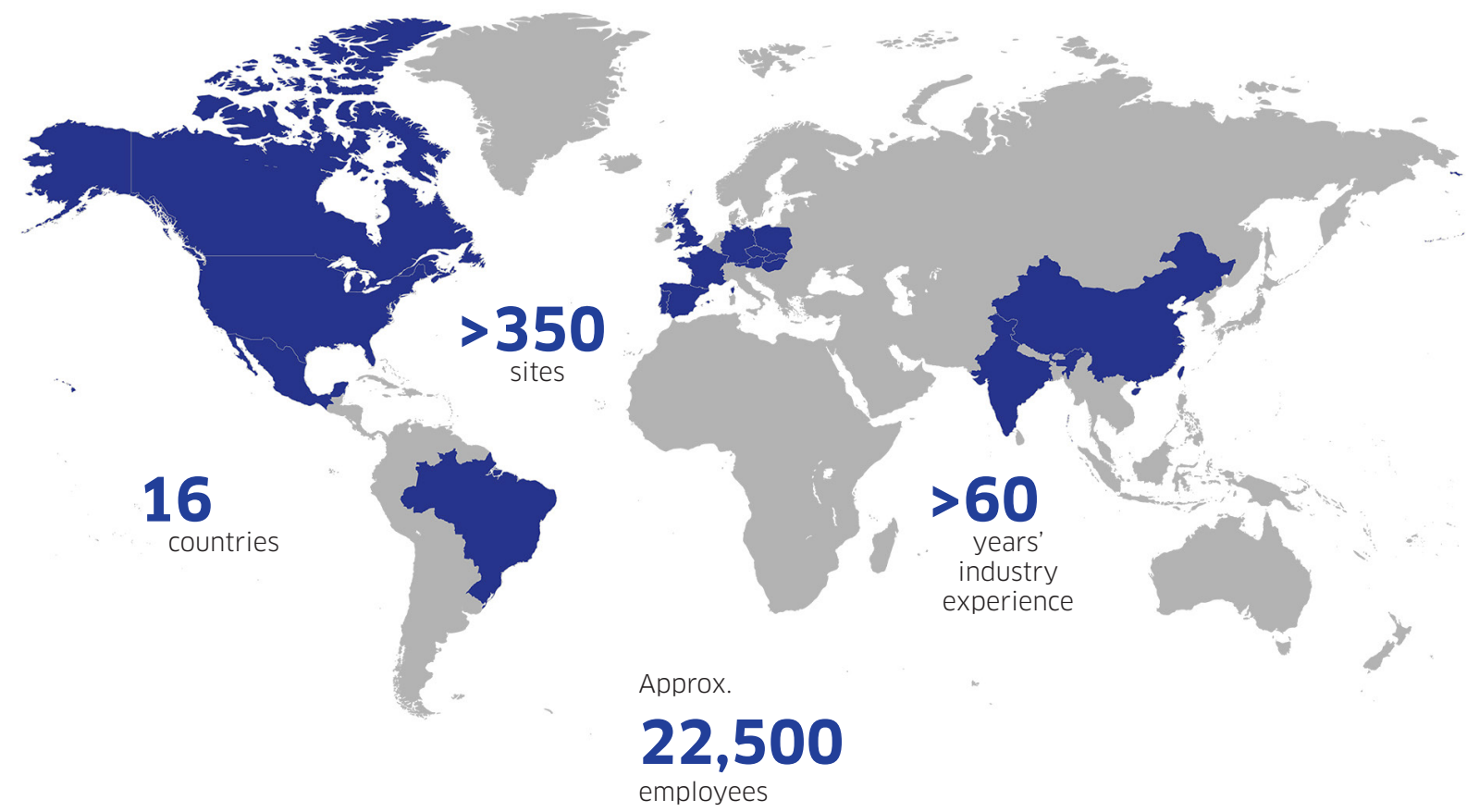
Modern Slavery and Human Trafficking Statement

At Leadec, we have a zero-tolerance approach towards modern slavery and human trafficking and are committed to acting ethically and with integrity in all business dealings and relationships. We continue to enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

This statement sets out the actions we have taken, and will continue to take, to prevent slavery and human trafficking. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024.

Organisational Structure

Leadec is the world’s leading service specialist for the entire life cycle of a factory and the associated infrastructure, providing facilities management, engineering, assembly, and logistics solutions worldwide. For more than 60 years, our customers around the globe have relied on our services throughout their entire production process – from planning to maintenance, modernisation, and digitalisation. Employing around 22,500 people worldwide, Leadec is based at more than 350 sites, often directly at the customers’ own plants and facilities. As of 31 December 2024, Leadec had 1,282 employees in the UK.



Policies and Procedures in respect of Modern Slavery and Human Trafficking within Leadec

We have a number of policies and procedures in place that apply to all employees working for Leadec in order to prevent modern slavery and human trafficking within our operations. These include:

Leadec Group Code of Conduct

This outlines the standards, actions and behaviours expected of our all employees when working for Leadec. This is a Global Code of Conduct and all employees are required to sign up to the Code of Conduct as part of their onboarding to Leadec. It is regularly reviewed by Leadec Group with the most recent review in January 2023.

The Code of Conduct specifically states:

- Leadec respects human rights worldwide.
- Leadec gives its employees fair pay and provides fair working conditions in compliance with all statutory requirements. We therefore also reject all forms of forced labour and child labour, and we will not obstruct lawful employee representation.

In February 2025, a new Global Directive for Human Resources Principles was introduced, which applies to all Leadec employees. This Directive serves as a guideline for the implementation of and compliance with human rights in all aspects of HR. It clearly outlines the principles that apply to our managers’ and employees’ behaviour, thereby contributing to the implementation of the Leadec Code of Conduct when managing and supporting our employees.

It confirms that the prohibition of child labour, forced labour, and all forms of modern slavery are at the centre of Leadec HR and reinforces that Leadec rejects any form of forced or child labour, human trafficking and all forms of modern slavery, servitude, or other forms of domination or oppression in the workplace environment, such as economic or sexual exploitation and humiliation.

Recruitment and Onboarding Procedures

We undertake right to work checks for all individuals joining Leadec directly. All employees must evidence their right to work in the UK before any offer of employment is made or within 60 days of any transfer under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (also known as TUPE).



We use a Right to Work app across our business to undertake right to work checks. The app has robust security measures in place, including facial recognition and the reading of biometric data, which ensures a more robust recruitment and TUPE transfer process, in line with our obligations in respect of the Immigration, Asylum and Nationality Act 2006.

Employees are not permitted to have their salary paid to a third-party bank account. This means that any new starters are required to provide the details of their own named bank account (either individual or joint account) in order to be paid. Only in exceptional circumstances and with the authorisation of the Board of Management will we allow transferring employees to have their salary paid into a bank account not in their name. This not only reduces the opportunity for fraud in our business, but also ensures that employees are paid directly for the hours they work.

We use only specified and approved employment agencies to support our operations with temporary labour. Our Procurement Department verifies the practices of any new agency we use, before accepting workers from that agency.

All new salaried employees receive an awareness guide as part of their onboarding into Leadec, detailing the principles of the Modern Slavery Act 2015, the potential warning signs and indicators, how to escalate any concerns and the external support available, including the Modern Slavery Helpline. In 2025, we will introduce a new online learning module on the topic of modern slavery, which all new starters will be required to pass.

Whistleblowing Policy

This Policy provides a framework for all individuals working for and on behalf of Leadec (including but not limited to employees, ex-employees, consultants, agency workers, work experience, and contractors) to raise concerns regarding the Company. This also extends to potential signs of slavery, human trafficking, or other human rights abuses. The Policy was updated and communicated to all individuals working within Leadec in 2022. All individuals working for or on behalf of Leadec are issued with a copy of this Policy upon joining the business and must sign to confirm that they have understood this.

Concerns in respect of modern slavery can be raised to:

- An individual's line manager
- Leadec's Compliance Officer
- The Leadec Integrity Line, or
- Safecall.

Safecall is an independent and external whistleblowing service provider which enables individuals to report any concerns via confidential reporting facility. Any concerns reported through Safecall are raised to the Board of Management and fully investigated.

Working Time Regulations

We ensure that our employees, including young workers, comply with the Working Time Regulations. Employees are able to opt out of the 48-hour working week limit working hours. We monitor daily and weekly rest breaks, and all employees that are night workers.

Training on Modern Slavery

Our supervisors and managers have received Modern Slavery training. This training explains what modern slavery is, the frequent indicators and/or signs within the workplace, and how to escalate concerns, further reinforcing the focus on ensuring individuals are not exploited whilst working for Leadec. If our management team identify any potential signs of modern slavery or have any concerns, they are aware that they must contact the HR Department or the Compliance Officer.

This training has also been extended across the Leadec business as part of our commitment to our Global Sustainability Plan. By using techniques such as e-learning, we have now delivered training on relevant human rights topics, including modern slavery, to 97% of Leadec employees worldwide. Our Policy Statement is aligned with the Ten Principles of the UN Global Compact, and we have made compliance with human rights requirements part of our internal audits. Our Human Rights and Supply Chain Committee is in charge of all risk related to human rights and supply chain and ensures that protected legal positions in Human Rights and Environment are observed.

Trade Union Membership

We recognise and respect each employee's right to freedom of association, including the right to belong, or not to belong, to a Trade Union. We have recognition agreements in place with Trade Unions for the purposes of collective bargaining across our business. In January 2025, we updated our Contracts of Employment to advise new starters that they are able to join a Trade Union of their choice and at sites where there is a Collective Agreement in place, their line manager can provide the contact details of their local representative.

Risk of slavery and human trafficking within Leadec

We have reviewed the modern day slavery and human trafficking risks within Leadec. In doing so, we have considered the industries we operate in, the locations of our operations and the current policies and procedures we have in place. Based on this, we consider that the risk of modern slavery or human trafficking occurring within the Leadec workforce to be low.



To date, no reports have been raised with regards to modern slavery within Leadec operations. In the event a concern was raised, this would be treated extremely seriously. An immediate and thorough investigation would be undertaken by a senior manager, with appropriate support from the Human Resources Department and Compliance Officer.

Tackling Modern Slavery within Leadec’s Supply Chain

Leadec sources goods and services from an extensive network of suppliers that are predominantly purchased through organisations situated in the United Kingdom. The diversity of these suppliers presents challenges in efficiently and effectively assessing and addressing supply chain-related issues such as human rights.

In addressing all risks (including slavery and human rights) within our supply chain, Leadec introduced in 2018 a strategic approach to supplier management. As part of this process, our supply chain will be categorised according to each supplier’s strategic importance to the Company.

Those suppliers identified as Tier 1 suppliers will be our primary focus. These are organisations which have a significant impact upon the quality of goods and/or services we use in undertaking our business.

As part of the Leadec Supplier Relationship Programme, suppliers will be actively managed in accordance with their respective tier status. There are agreements in place with the suppliers which range from framework agreements through to standard terms of purchase. It is a requirement during the onboarding process for suppliers to accept the Leadec Conditions of Purchase. Leadec communicates the standards expected of its suppliers through a variety of means, including, but not limited to, supplier assessments, supplier selection, direct interaction, emails, and through the Corporate website.

Leadec onboards suppliers using an established cloud-based system. For a supplier to become a partner to Leadec, they must undergo assessments and selection based on the criticality of the goods and/or services being provided. These processes require evidence of quality systems and other certification, including Modern Slavery Statements.

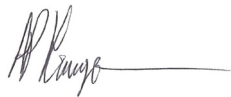
Supplier applications are reviewed and scored by the Leadec Procurement team. Only after satisfactory scoring is reached are suppliers added to the supply chain.

If we become aware of any slavery or human trafficking concerns, we reserve the right to suspend and ultimately deselect suppliers if the concerns are not addressed in an acceptable timeframe dictated by Leadec.

The Leadec Group Code of Conduct includes a section entitled “Cooperation with Business Partners”. This section specifically focuses on Leadec’s expected standards for its contractual relationships. A copy of this Code of Conduct is issued with all new supplier applications and all suppliers being onboarded are required to confirm receipt, acknowledgement, and understanding of all matters held within the Code of Conduct.

About This Report

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been prepared by the Human Resources and Procurement Departments and approved for publication by the Leadec UK Board of Management on 10th June 2025. It provides a summary of the steps we have taken to address the risk of slavery and human trafficking taking place within Leadec UK’s operations and supply chain, and is published annually.



Tony Hampson
Managing Director



Claire Gathercole
Finance Director



Lucy Roger
HR Director

Leadec UK is committed to ensuring the human rights, dignity, and wellbeing of everyone who works for and with our Company. We will continue to play our part in the fight against modern slavery in all its forms by building greater understanding amongst our own teams and only working with suppliers that meet our strict ethical standards.

– Tony Hampson, Managing Director

