

Anti-slavery and Human Trafficking Policy

THE COMPANY

The Haldane Group is one of the UK's largest independent builders merchant with 20 Branches across the UK and Isle of Man. We trade under Haldane Fisher, Plumbmaster, Haldane Fisher (Isle of Man), Key Hardware and also G E Robinson in England. We stock and sell building, timber and plumbing supplies to the trade and general public.

POLICY STATEMENT

Modern slavery is a crime and a violation of essential human rights. It can take various forms, such as slavery, servitude, forced/compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

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

The Haldane Group Ltd has a zero tolerance to slavery and human trafficking and we are committed to improving our practices to combat slavery and human trafficking. We are also committed to ensuring there is no modern slavery or human trafficking in in any part of our business or our supply chain.

RESPONSIBILITY FOR THE POLICY

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels have primary responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal controls and procedures to ensure they are effective in countering modern slavery. They are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You should raise concerns about any issue or suspicion of modern slavery in any parts of our business

or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action for misconduct or dismissal for gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

As part of our commitment we will carry out the following;

- Publish a statement of our stance to slavery and human trafficking on our website(s)
- Implement a training programme within the organisation focused on our procurement teams to raise awareness when dealing with our supply chain
- Gain a better understanding of how our supply chain are ensuring they are free from slavery and trafficking by conducting a survey of suppliers
- Ensure the Company's Anti Slavery and Human Trafficking policy is communicated to our workforce and supply chain.

This policy will be reviewed on an annual basis and has been prepared in response to section 54 of the Modern Slavery Act 2015.

Signed	
Position	CEO – Haldane Fisher
Date	January 2026
Review Date	January 2027

Haldane Group, Head Office, Shepherds Way, Carnbane, Newry, BT35 6QQ