

1. Statement of Policy

- 1.1 This policy statement has been published in accordance with section 54 of the Modern Slavery Act and sets out the steps and responsibilities for Castlemore, our employees, suppliers and subcontractors.
- 1.2 The United Kingdom Modern Slavery Act 2015 requires certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosure is intended to provide consumers with the ability to make better, more informed choices about the products and services they buy and companies they support.

2. Summary

- 2.1 Castlemore is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products. Castlemore realises that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and workplace abuse. Therefore, throughout this disclosure, we use the terms "slavery and human trafficking" to encompass these various forms of coerced labour.
- 2.2 We take certain steps during the fiscal year to ensure that slavery and human trafficking are not taking place in our supply chains or other parts of our business. To this end, we have established an integrated approach to managing human rights across our business, including risks related to slavery and human trafficking.
- 2.3 Our commitment to human rights, which covers topics such as forced labour, slavery, child labour, sex trafficking, workplace abuse and human trafficking, is outlined in this policy. We have invested time and resources in addressing system level improvements. Castlemore undertakes efforts aimed at ensuring there is no human trafficking or slavery of any form in our supply chain.

3. Verification

- 3.1 Castlemore takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. We stipulate that "We do not tolerate forced, debt bonded, indentured labour practices, or human trafficking. Castlemore does not allow harsh or inhumane treatment, including corporal punishment or the threat of corporal punishment. We expect our suppliers and others to meet these expectations." The Electronic Industry Citizenship Coalition Code (EICC), in turn, provides that, forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used."
- 3.2 We regularly notify our suppliers of their obligation to comply with the Castlemore policy and the EICC Code. For example, the vast majority of our supplier contracts contain language requiring suppliers to comply with these codes. Regular meetings are held with Castlemore's Directors to discuss and review our suppliers' performance related to issues such as slavery and human trafficking.
- 3.3 By way of brief summary, our verification process involves an annual assessment of our major suppliers. Each year, our major suppliers complete an evaluation questionnaire, including questions targeted at slavery and human trafficking risk. Castlemore uses this questionnaire to determine the risk profile of suppliers for environmental, safety, human rights (including slavery and human trafficking) and other supplier sustainability issues.
- 3.4 In addition to this evaluation questionnaire, we utilise a more detailed survey that covers slavery and

human trafficking risks targeted at those companies that we consider higher risk based on their location, foreign worker population, or other risked- based factors.

4. Supplier Audits

- 4.1 We view assessments and audits as integral parts of our overall supplier management process. They assist with identifying any compliance gaps where immediate action is needed, and root causes that enable development of systemic solutions and improvements.
- 4.2 Castlemore creates an annual risk profile for each of our major suppliers based on their supplier evaluation questionnaires, our knowledge of their operations and practices, and, where applicable, the results of targeted surveys. Suppliers that we identify as higher risk will undergo an audit and/or capability assessment. The audits are performed utilising a non-site audit performed by qualified Castlemore auditors. These audits are performed against either the full EICC Code or a targeted portion of the EICC Code
- 4.3 based on a supplier's risk profile and our specific compliance concerns. Audits are scheduled with the supplier in advance. We typically do not conduct unannounced audits.
- 4.4 Audit findings or non-conformances are ranked on a scale from minor to priority issues. Where priority issues are identified, such as those involving potential slavery and human trafficking violations, we demand an urgent, if not immediate, response from the supplier. When such potentially serious issues come to our attention, we, as appropriate, work with experienced outside counsel or other experts to investigate the matter. When other serious, but potentially less urgent, non-conformance issues are identified through an audit, the suppliers are required to draft comprehensive corrective action plans to address all audit findings, and we work with them to document actions taken and ensure closure.
- 4.5 Castlemore's Management Review Committee reviews a supplier's gap closure plans and closure evidence on a quarterly basis, or more frequently if needed. When we conclude that a given supplier is not making sufficient or timely progress to address audit findings, or the supplier's actions do not result in sustainable change, we work with the supplier to develop a suitable action plan.
- 4.6 Our goal when working with a supplier on an action plan is for the supplier to successfully address our findings. We engage and monitor the progress of the supplier until the issues are satisfactorily resolved. However, if satisfactory progress is not made, we are prepared to take additional action, such as not awarding new business until issues are resolved, placing the supplier on a "conditional use" status, or ending the supplier relationship. Moreover, Castlemore may report supplier misconduct to relevant government authorities.

5. Certification

- 5.1 Castlemore's suppliers must certify that products supplied to Castlemore comply with Castlemore purchase agreements and/or purchase order terms and conditions. These purchase agreements and/or purchase order terms and conditions require suppliers to represent and warrant compliance with the Castlemore policy and all applicable laws, regulations and international standards.

6. Internal Accountability

- 6.1 The Board of Directors of Castlemore hold overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 6.2 Castlemore's Directors set the tone for our ethical culture and holds managers accountable for

communicating ethics and compliance expectations. Each year, our Directors communicate with employees and senior managers regarding the importance of ethics and legal compliance.

6.3 Castlemore requires its employees and contingent workers to comply with this policy, which forbids human trafficking and references Castlemore's Human Rights Principles. An employee's violation of the policy may result in discipline, up to and including, termination and/or reporting the misconduct to the relevant government authorities.

7. Compliance with the Policy

7.1 We encourage anyone (including employees, contractors, suppliers, distributors, and customers) to report in good faith any issues or concerns about potential ethics, human rights, legal, or regulatory violations, including improper or unethical business practices such as fraud or bribery. Castlemore investigates concerns raised and strives to resolve each consistent with the law and Castlemore policy.

7.2 Individuals must notify a member of the senior management team or the HR Manager as soon as possible if they suspect that a conflict to this policy has occurred or may occur in the future.

Michael McDonnell
Group Chief Operating Officer