

PERMASTEELISA GROUP UK & EUROPE

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the Financial Year Ending 31 March 2026

1. Introduction and Commitment

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 in relation to the UK and European operations for the Permateelisa Group (*Permateelisa*). This statement sets out the steps taken during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in Permateelisa's business and supply chains.

Modern slavery is a criminal offence and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking.

Permateelisa firmly supports ethical labour practices and has a zero-tolerance approach to modern slavery and human trafficking.

Permateelisa expects a high standard of ethics and compliance from its officers and employees, subcontractors and supply chain and all other parties with which it conducts business. We are dedicated to playing an active role in eradicating modern slavery and at all times seek to act as a responsible and ethical organisation in order to identify and manage risks and set high standards for compliance, including ensuring those with which we engage uphold similarly high standards.

2. Organisation, Business and Supply Chains

Permateelisa is a global leading specialist façade contractor operating in various jurisdictions, including in the UK and Europe. Permateelisa provides specialist façade design, engineering, manufacture, supply and installation services, including maintenance and aftercare.

Permateelisa (UK) Limited is the UK subsidiary of the Permateelisa Group and has its registered office in London. Within the UK, Permateelisa performs specialist services on behalf of its clients.

Our activities are delivered through a combination of directly employed staff, subcontractors, agents and

suppliers. We employ around 100 people directly in the UK and work closely with other staff across the Group in our other locations. We also engage subcontractors, agency staff, advisors and consultants based on project needs across the UK.

We greatly value our workforce and external relationships and through our work we have been involved in iconic developments in the UK, Europe and globally. We have also built and maintained longstanding relationships with the majority of our external stakeholders, including subcontractors and suppliers over many years. However, we acknowledge a key risk for our business is the tiered supply chain structure in the construction industry and the cross-jurisdictional stakeholders with which we engage.

Our subcontractors and suppliers have each undertaken a rigorous pre-qualification process to ensure their competencies and compliance with Permateelisa's values, expected industry standards and statutory requirements.

Our subcontractors and supply chain generally include:

- Designers and engineers of specialist façade systems and related components;
- Manufacturers and suppliers of construction materials and components;
- Specialist subcontractors and labour providers;
- Logistics, transport and support service providers;
- Professional services providers, advisors and consultants.

We recognise that construction supply chains can be complex, particularly across different jurisdictions and locations. We also acknowledge that certain activities, including labour-intensive works and international sourcing of materials, may present a higher inherent risk of modern slavery. As a result, we remain vigilant of the risks posed and apply our best practice approach to each project we undertake.

3. Policies in Relation to Modern Slavery

PermaSteelisa maintains policies and procedures that support our commitment to preventing and eradicating modern slavery. Our policies and procedures are implemented within specific regions and locations to ensure they are applicable to best practices and standards relevant to the statutory requirements and standards where our officers and employees are working.

Our current policies and procedures which relate specifically to the UK, include:

- Employee Code of Conduct, which sets the standards by which we expect all employees to conduct themselves;
- Modern Slavery and Human Trafficking Policy, which sets out our expectations and approach;
- Supplier Code of Conduct, which requires suppliers and subcontractors to comply with applicable labour laws and prohibits forced labour and human trafficking;
- Whistleblowing Policy, which enables concerns to be raised confidentially and without fear of retaliation.

These policies apply to our officers and employees and also form part of our standard contractual obligations for suppliers and subcontractors where appropriate. Our policies are included in our Employee Handbook and also available on the intranet. Where required, we provide copies of our policies to external stakeholders, subcontractors and suppliers.

PermaSteelisa is also subject to contractual requirements in relation to the projects it undertakes and other client policies which require a high standard and high level of compliance – PermaSteelisa must ensure it meets these standards in order to continue to successfully deliver its projects and the works it undertakes. PermaSteelisa imposes similar contractual requirements on its own supply chain.

In order to further demonstrate compliance to the market and its external stakeholders, PermaSteelisa maintains ISO accreditation and Achilles Building Confidence accreditation in order to demonstrate a high level of compliance, health and safety and sustainability. We encourage our supply chain to achieve similar accreditations where possible.

4. Risk Assessment and Management

PermaSteelisa adopts a proportionate, risk-based approach to assessing modern slavery risk. With respect to the industry and services we undertake, some risk considerations include:

- The use of subcontracted or agency labour;

- Labour-intensive site activities;
- Supply chains involving multiple tiers; and
- Sourcing of materials or services from various jurisdictions.

Risk assessments are informed by the nature of the work undertaken and the characteristics of our supply chain. Where higher risks are identified, enhanced due diligence measures may be applied.

Our due diligence processes are designed to identify and mitigate modern slavery risks and include:

- Supplier onboarding checks, which include compliance questionnaires and confirmation of adherence to our Supplier Code of Conduct;
- Contractual provisions requiring compliance with applicable labour laws and modern slavery legislation as well as our policies and procedures;
- Ongoing engagement with suppliers and subcontractors, particularly in higher-risk categories;
- Establishing long term relationships with our supply chain in order to build confidence and establish working standards.

Where concerns are identified, PermaSteelisa will engage with the relevant party to seek appropriate corrective action. Serious or unresolved issues may result in termination of the commercial relationship, however we have not experienced such non-compliance and given the longstanding and established relationships with many of our subcontractors and suppliers, we expect that they will work together with our organisation to ensure high standards are being met and ethical labour practices are given high priority with their respective organisations.

5. Training and Awareness

PermaSteelisa recognises the importance of awareness and ongoing training and development in preventing modern slavery. Training and guidance are provided to relevant employees, including those involved in procurement, commercial management and project delivery, to support understanding of modern slavery risks and reporting procedures.

We also deliver training and guidance to our subcontractors and suppliers, in particular where higher risks may exist and should be managed such as on-site labour force. We deliver tool box talks on all our active sites and ensure guidance is provided both in English as well as other native languages (such as Romanian).

Training requirements are reviewed periodically to ensure they remain appropriate to the nature and scale of our operations.

6. Effectiveness

PermaSteelisa keeps its approach to modern slavery under review to assess effectiveness and identify opportunities for improvement. This includes:

- Implementation of relevant policies and procedures and regular review of such policies and procedures to ensure they remain up to date and are aligned with evolving best practices;
- Supplier engagement and compliance activities, including improvement and updating of our prequalification checks for new suppliers;
- Audits of existing supply chain and subcontractors;
- Providing adequate processes for reporting issues or concerns, including adequate protection for whistleblowers;
- Ensuring prompt actions are taken where ethical labour concerns are raised.

Given the nature of our operations, effectiveness measures are qualitative and proportionate.

7. Reporting Concerns

PermaSteelisa encourages employees, suppliers and other stakeholders to report any concerns relating to modern slavery or unethical labour practices. Reports can be made through line management, senior management, our People team or our whistleblowing arrangements.

All reports are taken seriously and handled appropriately.

In the past year we were made aware of instances where ethical labour concerns were raised in relation to sub-subcontractors of our subcontractor who were engaged on construction sites. We promptly investigated and resolved these concerns by providing detailed information to demonstrate the concerns were adequately addressed.

We encourage our subcontractors to constantly improve their processes and procedures in order to meet the high standard we expect and to remain current with industry best practice.

8. Next Steps

PermaSteelisa remains committed to continually improving its practices and upholding the highest standards of compliance.

Throughout previous years we have undertaken the following steps:

- Undertaken tool box talks and workforce engagement meetings with our subcontractors;
- Improved prequalification questionnaires to ensure key risks are addressed such as ensuring our subcontractors maintain their own updated policies, code of conduct and issue written contracts to their employees and subcontractors;
- Ensuring Modern Slavery training is completed by employees and improving internal compliance by ensuring a high rate of completion;
- Updating and improving our Code of Conduct and Employee handbook.

We continue to develop and enhance our practices with a particular focus on the key actions below:

- Continue to actively engage with internal and external stakeholders with respect to ethical labour practices, in particular preparing training for staff and subcontractors and implementing checkins and audits;
 - Continue to strengthen collaboration with our subcontractors and supply chain, which may include better auditing on a regular basis;
 - Achilles Gold CHAS Certification: we aim to ensure all subcontractors and suppliers are able to achieve Achilles certification by demonstrating the competencies and compliance required;
 - Work towards implementing a Learning Management System which includes modern slavery training and records completion on an annual basis.
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9. Approval

This statement was approved by the Board of Directors of PermaSteelisa (UK) Ltd on 30 March 2026 and is signed on its behalf.

John Conboye
Director
PermaSteelisa (UK) Limited