

Modern Slavery and Human Trafficking Statement

Singleton Birch Limited is committed to upholding the objectives of the Modern Slavery Act 2015. We act ethically, with integrity and transparency across all aspects of our business and supply chains. We are dedicated to ensuring that modern slavery, in any of its forms, including slavery, servitude, human trafficking, and forced labour, has no place within our operations.

Singleton Birch is a wholly owned subsidiary of the US based MLC, which is in turn part of the HBM group of companies. Singleton Birch's operations are based in the United Kingdom.

Our Supply Chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our operations and supply chains. However, we remain vigilant and proactive in ensuring that all potential risks are identified and addressed.

Our supply chains are limited, and we procure goods and services from a restricted range of trusted UK and overseas suppliers. We maintain close working relationships with these suppliers and expect them to adhere to the same high ethical standards we uphold.

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains. We recognize our responsibility to take a robust approach to preventing slavery and human trafficking and are fully committed to acting ethically and with integrity in all our business dealings.

We have implemented policies and procedures to ensure compliance with the Modern Slavery Act 2015, including:

- Conducting due diligence on suppliers and contractors to assess their compliance with anti-slavery measures
- Incorporating anti-slavery obligations into our procurement processes and ensuring our supplier contracts cover this
- Every employee is required to complete an e-learning module on recognising the signs of modern slavery and understand the steps to take if they suspect any form of exploitation
- Reviewing our policies and practices regularly to identify and address any risks of slavery or human trafficking
- We expect all individuals and organizations we work with to share our zero-tolerance approach and to uphold the highest standards in combating modern slavery

Policies

Singleton Birch Limited has a number of internal policies designed to safeguard against modern slavery and human trafficking across all areas of our business and supply chains. These include:

- **Ethics Policy** – Promotes a culture of integrity, ethical decision-making, and respect for human rights across the business

- **Supplier Code of Conduct** – We have a conduct currently in place but are constantly striving to improve this policy. The policy sets out clear expectations regarding ethical labour practices, including zero tolerance for forced labour, slavery, or trafficking

Whistleblowing Policy – Provides employees and third parties with a confidential mechanism to report concerns, including those related to modern slavery, without fear of retaliation.

We are committed to maintaining and improving these policies, raising awareness among staff, and ensuring they are fully embedded into our culture and operations.

Due Dilligence

All of our employees have the necessary documentation to legally work in the UK and no one under the legal minimum age for admission for work is employed. Employees are paid at least the National Minimum Wage/National Living Wage. Our suppliers of contactors and agency workers are responsible for ensuring their workers are working legally in the UK.

Our employees are required to complete a Modern Slavery Awareness e-learning module and we have a clear Whistleblowing Policy and actively encourage the reporting and exposure of unethical behaviour, including any instances where slavery and/or human trafficking is involved. We also have an external confidential Ethics Hotline in place via Navex which reports of Modern Slavery can be reported via.

This statement has been reviewed and approved by Singleton Birch's Leadership Team and will be reviewed annually, in accordance with Section 54(1) of the Modern Slavery Act 2015.

Our Financial Year end was 31st December 2024.

John Conard
Interim Site Lead
June 2025