


Document Number	SHEQ-0627	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	

## Anti-Slavery and Human Trafficking Policy

### Statement of Intent

Modern slavery is a serious crime and a breach of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve depriving a person of their liberty for personal or commercial gain. Errigal maintains a zero-tolerance approach to all forms of modern slavery and is committed to acting ethically and with integrity in every aspect of our business and supply chains. We implement and enforce effective systems and controls to prevent modern slavery from occurring in our operations or those of our suppliers.

This commitment is consistent with our obligations under the Modern Slavery Act 2015 (United Kingdom) and, where applicable, the Criminal Law (Human Trafficking) Act 2008 (Ireland). We require the same high standards from all contractors, suppliers, and business partners. Our contracting processes include explicit prohibitions on the use of forced, compulsory, or trafficked labour, or on anyone being held in slavery or servitude, and we expect our suppliers to apply the same standards throughout their own supply chains.

### Responsibilities

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 and the use of any form of forced labour is strictly prohibited. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

You are encouraged to 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 that a breach of this policy has occurred or that it may occur, you must notify your manager as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

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.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever

Document Number	SHEQ-0627	Prepared By	SHEQ Department	
Revision Number	02	Date	05/01/2026	

form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our grievance procedures.

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 zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

#### Performance, Monitoring and Review

Implementation of this policy will be monitored on a monthly basis through the monitoring and reporting of health and safety performance statistics. The effectiveness of management arrangements together with our performance against stated objectives is routinely monitored and reported to the Errigal Board on a regular basis.

#### Authorisation

 \_\_\_\_\_ 05/01/2026

 \_\_\_\_\_ 05/01/2026

Cormac McCloskey & Damien Treanor

Managing Directors (Errigal)