

MODERN SLAVERY STATEMENT 2024

References to **we, us** and **Hughes** in this statement relate to **Hughes Safety Showers Limited** on behalf of itself and its subsidiaries and affiliates, including Terraplas and Justrite Safety Products Ltd.

This modern slavery statement is the first that Hughes has published. It is published in accordance with section 54 of the Modern Slavery Act 2015 (the **Act**). Modern slavery and human trafficking is a heinous crime and is a morally reprehensible act that deprives a person's freedom and dignity for another person's gain. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. This is a real problem for millions of people around the world, including in many developed countries, who are being kept in various forms of slavery. Every company is at risk of being involved in this crime through its own operations or that of its supply chain.

Our business

We conduct all of our business in an honest and ethical manner.

We operate as a company that provides safety products, including safety showers, eyewash stations, turf protection, temporary stadium flooring and ice protection and other various safety products in the UK, US and worldwide. Hughes also follows the Justrite Safety Group's, its parent company, Global Code of Conduct (the **Code**). Our Code applies to every associate, affiliate, representative and Board member. Our Code governs all our decisions and actions, whether in our offices, plants, warehouses, or boardroom, or in the field selling our products to customers.

Our Code applies to:

- All Justrite Safety Group associates around the world, including Hughes associates
- Members of the Justrite Safety Group Board of Directors when they act in their capacity as directors
- Hughes representatives and distributors

Justrite Safety Group's executive team is accountable for promoting, monitoring and enforcing our Code. However, the ultimate responsibility for following our Code and for maintaining our culture of ethical excellence rests with each one of us individually.

As an employer in the UK and elsewhere, our employees are at the heart of our business and two of our core values are develop self and others and teamwork. We focus on not only giving the opportunities and pathways for development but also supporting them throughout the process and investing in their overall wellbeing.

We comply with all applicable legislation relating to employee terms and conditions, including pay. We provide fair and equitable wages, benefits and other conditions of employment.

Our policies

Our Anti-Slavery Policy and supporting documentation reflects the changes and the progress we have made in relation to our supplier processes. We have a number of other relevant policies in place which support our compliance with the Act and which are reviewed and updated as appropriate on a rolling annual basis, including:

- Non-Retaliation,
- Diversity and Inclusion,
- Human Rights,
- Anti-Discrimination,
- Anti-Harassment,
- Anti-Violence,
- Health and Safety, and
- Whistleblowing policy.

We continue to provide training to our staff on the key points of these policies, as appropriate.

Our supply chain

We expect all of our contractors and suppliers to meet the same high ethical standards that we apply to our own business. Our Suppliers adhere to the Justrite Safety Group's Supplier Code of Conduct.

Our supply chain is multinational. It mainly consists of purchasing parts, materials and components to manufacture our safety products and the purchase of services and goods to support our facilities, operations and associates. Where possible we establish long standing relationships with reputable suppliers and contractors, who themselves have suitable anti-slavery and human trafficking policies and procedures.

Risk assessment and due diligence

Due diligence is conducted on new suppliers and various existing suppliers to better understand the risk posed, and following completion of this due diligence exercise we have identified no evidence of modern slavery regarding these suppliers.

We will continue to review and refine how we engage with our existing suppliers and our processes for onboarding new suppliers, including incorporating appropriate provisions in our contractual arrangements with suppliers.

Key Performance Indicators

We will continue to develop and refine our anti-slavery procedures and we believe that, at this stage, it remains inappropriate for us to adopt any specific modern slavery key performance indicators. However, we will keep this under review.

Approval

This slavery and human trafficking statement for the financial year ending December 31, 2024 is signed by Paul Darlington, Vice President and Director on behalf of the members of Hughes Safety Showers Limited in accordance with section 54 of the Modern Slavery Act.

Paul Darlington

Paul Darlington, Vice President and Director

October 2024