Ethical Conduct, Anti-Slavery and Human Trafficking Policy

ETHICS POLICY

It is the policy of The Owens Group that its employees and Board of Directors uphold the highest standards of ethical, professional behaviour. To that end, these employees and Directors shall dedicate themselves to carrying out the mission of this organization and shall:

1) Hold paramount the safety, health and welfare of the public in the performance of professional duties.

2) Act in such a manner as to uphold and enhance personal and professional honour, integrity and the dignity of the profession.

3) Treat with respect and consideration all persons, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin.

4) Engage in carrying out The Owens Group. mission in a professional manner.

5) Collaborate with and support other professionals in carrying out The Owens Group mission.

6) Build professional reputations on the merit of services and refrain from competing unfairly with others.

7) Recognize that the chief function of The Owens Group at all times is to serve the best interests of its constituency.

8) Accept as a personal duty the responsibility to keep up to date on emerging issues and to conduct themselves with professional competence, fairness, impartiality, efficiency, and effectiveness.

9) Respect the structure and responsibilities of the Board of Directors, provide them with facts and advice as a basis for their making policy decisions, and uphold and implement policies adopted by the board of directors.

10) Keep the community informed about issues affecting it.

11) Conduct organizational and operational duties with positive leadership exemplified by open communication, creativity, dedication, and compassion.

12) Exercise whatever discretionary authority they have under the law to carry out the mission of the organization.

13) Serve with respect, concern, courtesy, and responsiveness in carrying out the organization's mission.

14) Demonstrate the highest standards of personal integrity, truthfulness, honesty, and fortitude in all activities in order to inspire confidence and trust in such activities.

15) Avoid any interest or activity that is in conflict with the conduct of their official duties.

16) Respect and protect privileged information to which they have access in the course of their official duties.

17) Strive for personal and professional excellence and encourage the professional developments of others.

THIS POLICY DOES NOT CONSTITUTE PART OF THE CONTRACT OF EMPLOYMENT

1. ANTI SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Owens Group have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

POLICY ON CHILD LABOUR

1.5 We acknowledge that according to the UN Convention on the Rights of the Child, a person is a child until the age of 18. We recognize the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

1.6 This policy stresses that child labour is not accepted.
Child labour and young workers, ILO Conventions 138 and 182, ILO recommendation 146 and 190, United Nations Convention on the Rights of the Child, The Children's Rights and Business Principles Fundamental: Child labour is not accepted.

No persons shall be employed at an age younger than 16 or younger than the legal age for employment if this is higher than 16. All legal limitations regarding employment of persons below the age of 18 shall be followed. They should be protected from any hazardous work, night shift and any kind of work that might hamper their development or impose any physical harm. Necessary measures shall be taken to prevent that no one under the legal age of employment is recruited. The employer shall develop, or participate in, and contribute to policies and programs which provide transition of any child found to be performing work in the workplace to enable her or him to attend and remain in quality education until no longer a child. The best interest of the child should be applied in consultation with the child's parents and/or guardian.

1.7 WHAT IS EXPECTED OF BUSINESS PARTNERS

Business partners are required to have systems in place to ensure that child labour is not employed directly by the business partner or by any partner/sub-contractor. Owens Group reserves the right to seize cooperation with business partners that violate this policy.

2. RESPONSIBILITY FOR THE POLICY

2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Group HR Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Business Services Manager.

3. COMPLIANCE WITH THE POLICY

3.1 You must ensure that you read, understand and comply with this policy.

3.2 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager or the compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

3.4 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.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

3.6 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 or the compliance officer.

3.7 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 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 Procedure.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 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.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. BREACHES OF THIS POLICY

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

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

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Owens Group are committed to improving our practices to combat slavery and human trafficking.

Organisation's Structure

Owens Group are a group of companies - our ultimate parent company is Owens Road Services Limited. Owens Road Services Limited has its head office in Llanelli, Carmarthenshire, SA14 8QE. The Owens Group has over 1000 employees and operates in only in the United Kingdom.

Owens Group has an annual turnover of £50 million.

Our Business

Our business mainly involves distributing goods. As well as the operational team, there is a significant support and administrative function.

Our Supply Chains

Our supply chains include obtaining goods from a number of parties, predominantly brokered by Owens Road Services Limited.

Our Policies On Slavery And Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and in so far as is possible to requiring our suppliers hold similar ethos.

Due Diligence Processes For Slavery And Human Trafficking

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to develop training for our staff.

Further Steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our business we intend to look to develop a specific policy for inclusion in our existing business policies and to share this with our supply chain and impress upon our supply chain the need to adopt a similar policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30th June 2026.

SIGNED

HUW OWEN MBE
MANAGING DIRECTOR
FOR AND ON BEHALF OF THE OWENS GROUP.