

Modern Slavery Act Statement

Introduction

Senior plc (“Senior” or “the Company”) is committed to preventing slavery and human trafficking in its corporate activities and in its supply chain.

This statement sets out the Company's actions to assess potential modern slavery risks related to its business and the adoption of processes to minimise any risk of slavery or human trafficking in the Company's business and supply chain. This statement relates to actions and activities during the financial year to 31 December 2024.

Structure of the Senior plc Group and its supply chain

Senior is an international, market-leading, engineering solutions provider with 26 operations in 12 countries (UK, USA, Canada, Mexico, South Africa, France, Germany, Czech Republic, India, Thailand, Malaysia and China). Senior designs and manufactures high-technology components and systems for the principal original equipment producers in the worldwide aerospace & defence, land vehicle and power & energy markets.

Each Group operation is responsible for managing its own supply chain, although there are circumstances where operations collaborate to jointly purchase materials. A significant proportion of Senior's supply chain is involved in the purchase of various metals or metal products (such as castings, casings, tubes or sheet metal) from US-based and European suppliers, with a sizeable element of these materials being nominated or directed by our customers.

Relevant policies

We are committed to conducting our dealings, whether with customers, suppliers, employees or the communities in which they are based, with the utmost integrity. To achieve this aim, Senior operates the following policies that include its approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations:

- **Code of Conduct**

Senior's Code of Conduct (the Code) is reviewed on a regular basis and provides a clear framework of principles and guidance that sets out standards of ethical behaviour we expect from all employees and the people that work with us. This includes treating everyone fairly and respecting human rights.

All employees are issued with a personal copy of the Code. All new joiners are issued with a copy of the booklet, which is available in all languages applicable to the Group's employees. All employees must complete the Group's annual Code of Conduct training.

The Company conducts annual Control Self Assessments, encompassing questions related to the Code, across all operating businesses. These are further supported by internal audits.

- **Sustainable Sourcing Policy**

Senior has a Sustainable Sourcing Policy which defines the environmental, ethical and social responsibility principles that all Group suppliers must adhere to. The policy is reviewed and updated on a regular basis. Senior has developed the following set of Sustainable Sourcing Standards, anchored in internationally recognised standards and legislation:

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| 1. Business Ethics | 6. Freedom of Association |
| 2. Wages and Benefits | 7. Health and Safety |
| 3. Working Hours | 8. Fair procedures and remedies |
| 4. Non-Discrimination | 9. Harsh and inhumane management practices |
| 5. Child labour | 10. Environmental Management |
| | 11. Data Privacy and Protection |

Suppliers are expected to adhere to these Standards at all times.

The responsibility to promote, maintain and enforce Senior's commitment to sustainable sourcing spans across all levels of the organisation. As part of due diligence process, all suppliers must be screened in accordance with the Policy prior to engaging in any procurement activities. Compliance with the Policy is monitored through supplier audits and periodic reviews.

Senior aims to be a good partner; it will work with its suppliers to support any necessary improvements and encourage continual improvement. Failure to comply with the Sustainable Sourcing Standards would result in a review, and possible termination, of the supply contract.

- Human Rights Policy

Senior's Human Rights Policy clearly sets out the standards we expect from our employees, customers and suppliers regarding Human Rights. At Senior, we strive to do business in a responsible way, respecting the human rights of our workers and everyone we come into contact with. We also expect our suppliers to respect and adhere to the policy. The policy clearly states Senior's commitment to respecting internationally recognised human rights as set out in the International Bill of Human Rights and the core labour standards recognised by the International Labour Organisation.

We want to work with suppliers who share our commitment to human rights and our expectations concerning the responsibility to respect human rights, and we will take appropriate measures where those expectations or obligations are not met. Where a human rights violation is identified, we'll work with all parties involved to seek access to remedy, compensation and justice for the victim. We'll also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring.

- Whistle Blowing Policy

Senior's long-standing Whistle Blowing policy encourages and enables all its employees, customers and other business partners to report any ethical concerns they may have concerning the direct activities of, or the supply chains of, the Group. This includes any circumstances that may give rise to the risk of slavery or human trafficking. The whistle blowing procedure, which includes an independent third-party reporting portal, is designed to allow workers and other stakeholders to raise any concerns they may have, without fear of retaliation. This service is available in all languages appropriate to our global locations. Senior will not tolerate the harassment or victimisation of a person reporting corporate misconduct in good faith. In addition to the legal protection provided to such persons, Senior will treat retaliation against a person reporting corporate misconduct as a violation of the policy and a serious disciplinary offence.

All whistle blowing reports are investigated under the terms of strict confidentiality to the fullest extent possible. On conclusion of the investigation, the whistle blower is informed of the outcome of the investigation and what action Senior has taken, or proposes to take, as a result of the investigation.

All reported whistle blowing incidents are reviewed by the Board of Directors.

Board approval

This statement is made in accordance with section 54 (1) of the Modern Slavery Act 2015 and is applicable to all Senior plc group companies including Senior plc, Senior UK Limited and Lymington Precision Engineers Co. Limited. The statement has been approved by the Company's Board of Directors on 26 February 2025, who will review and update it annually.

Signed on behalf of the Board by

David Squires
Group Chief Executive Officer, Senior plc

Date: 26 February 2025