

Modern Slavery Act Policy & Statement

This Policy is in compliance with the Modern Slavery Act 2015. Glanua carry out Design, Build, Operation and Maintenance Contracts on Water and Wastewater Infrastructure in Ireland and the UK. The Group currently employ staff in Office and projects across Ireland and the United Kingdom. Glanua recognises that slavery and human trafficking remains a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where that are expected to act upon them.

The business activities of Glanua Client base are Water Utility, Energy, Industrial, Dairy, Manufacturing, Transport, Civil Engineering and Building. To support the wide range of business activities, we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business. We are committed to ensuring there is no modern-day slavery or human trafficking in our supply chains or in any part of our business.

Our Supply Chain is focussed on the activities of:

- Procurement of Construction Materials
- Hiring and provision of plant and machinery
- Sourcing subcontracted labour services to support and augment our existing resources.

The primary focus of implementing this Policy on Modern Slavery and Human Trafficking Statement across the Group is to ensure that anti-slavery activity is recognised and embedded within our business as standard practice. We endeavour to ensure that all staff members, regardless of position, take joint responsibility for the identification and reporting of issues, to ensure basic standards are clearly communicated and met. This Policy takes in account and supports the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. The implementation and operation of this management system underlines our commitment to this policy statement.

The following is a list of steps we have taken to ensure no Modern Slavery or Human Trafficking exists within our own business or any of our Supply Chains:

- Glanua do not accept Modern Slavery and Human Trafficking in any form and adhere to the 2015 Modern Slavery Act.
- We will distribute this Modern Slavery Act Policy and supporting information to existing workforce, suppliers, subcontractors and labour providers. This statement will be published on our corporate website.
- Increased stringent vetting and investigation of our Supply Chain; Changes to the structure of our supply chain pre-qualification questionnaire and processes, requesting that all potential suppliers adhere to the ethics detailed in the Glanua Corporate Social Responsibility statement and behaviours detailed therein. Additionally, we work in conjunction with Constructionline and Achilles supplier pre-qualification systems which address the issues of Modern Slavery and Human Trafficking within their integral audit acceptance processes.
- Glanua will implement an ongoing programme of Procurement team training on Ethical Procurement and Supply in conjunction with the Chartered Institute of Purchasing and Supply, to instil practices of issues identification, reporting methods, issue management and improvement. This staged process will ensure due diligence and transparency of action at all stages.
- Promotion of contact details and awareness of modern slavery issues across the Group and supply chains for individuals to obtain guidance and support including the UK Government Modern Slavery Helpline, Slavery

and Human Trafficking helplines for both male and females and website resources for definitions, identification and practical assistance.

- We encourage the reporting of concerns and the protection of whistle-blowers.
- Distribution of our regularly updated Policy across our business and supply chain.
- Delivery of our Modern Slavery training forms part of our Corporate Induction presentation to all new members of staff, featuring guidance on identification and methods of reporting suspected instances.
- Ongoing development of our KPI's, reporting and auditing measures developed in conjunction with the Glanua Supply Chain.

For the benefit of this statement, these measures are subject to ongoing review and additional measures will be developed and implemented as required and reviewed as minimum on an annual basis. This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement.

SIGNED:
Director



Date: 09/01/2026