Modern Slavery Statement

Opening Statement from Senior Management:

The Adelphi Group of Companies is dedicated to preventing Modern Slavery and Human Trafficking taking place within its business and supply chain and we place the same expectation on our suppliers.

Modern Slavery is a terrible crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At The Adelphi Group of Companies, we believe all companies should have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Structure and Supply Chains:

- The Adelphi Group comprises five companies three engineering companies that design and make filling and mixing machines for the chemical, pharmaceutical, food & beverage and cosmetic & personal care industries. These are namely Adelphi Masterfil, Adelphi Manufacturing and Pharma Hygiene Products. One company that supplies high quality healthcare packaging products, namely Adelphi (Tubes) Ltd, and Adelphi Holdings. The company was founded in 1947 and is a family owned and run business. It is a British company committed to British Manufacturing and providing high quality products.
- The Company is principally engaged in the innovation, manufacture, marketing and distribution of premium health care packaging, stainless steel vessels, filling and mixing machines.
- The Companies' headquarters are in Haywards Heath, England.
- Two of our core values are supporting the local community and economy; and nurturing the next generation.

<u>Due Diligence Processes Relating to Slavery and Human Trafficking -</u>

Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with QC standards, safety and regulatory requirements. We use Dow Jones due diligence reporting to identify any financial crime or reputational risks posed by third parties.

We have not at any time been made aware of any allegations of human trafficking/slavery activities against any of our suppliers.

We undertake that if this were to occur, then we would act immediately against the supplier and officially report the matter immediately to the relevant authorities.

Policies Relating to Slavery and Human Trafficking -

The following policies exist within our organisation which demonstrate our opposition to modern slavery:

Ethical Procurement Policy
Ethical Trading Policy
Supplier Code of Conduct

We ensure our suppliers are aware of our policies and encourage them to adopt the same high standards.

Risk and Compliance:

Our organisation regularly evaluates the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring. The following list of risk management activities and/or procedures demonstrates our commitment to compliance:

Our supplier questionnaire for any product has been updated to specifically include a clause to establish the supplier's own policy and zero tolerance for human trafficking and modern slavery. This check is also added to technical agreements and any new contract manufacturer supply agreements. These are reviewed/updated three yearly.

Our Quality Management System ISO 9001:2015 clause 4 Context of the Organisation requires that we have a procedure to assist our understanding of the organisation and its context, and to determine external and internal issues relevant to its purpose including risk, current mitigation and additional mitigation required. Management identify risks and review these as part of the quality management review process. Risks are assessed both in the supply chains and in every part of their own business. QMR meetings are held quarterly.

The Company operates the following policies in our operations:

- Whistleblowing Policy we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of reprieve
- Code of Conduct our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the company.
 We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- Anti-Bribery and Anti-Corruption Policy: It is the policy of Adelphi to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Child and Forced Labour: The Adelphi Group of Companies is committed to
protecting the human rights of everyone who works for the company and all those
who have dealings with it. As a responsible company, we support the United Nations
Universal Declaration of Human Rights that sets "common standards of achievement
for all people and all nations."

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes The Adelphi Group of Companies' slavery and human trafficking statement for the financial year ending 2024.

This policy document was approved in the board meeting conducted on January 16th 2025 and signed by Chris Wilson, **Managing Director on 16/01/2025** and Gavin Crauford Taylor, **Managing Director on 16/01/2025**. It will also be regularly reviewed and updated by the Board of Directors.

Chris Wilson

Gavin Crauford Taylor

