



HEATHCOTE

HOLDINGS

HEATHCOTE HOLDINGS LIMITED MODERN SLAVERY STATEMENT FOR THE FINANCIAL YEAR 2025

For the purposes of this Modern Slavery Statement, references to “the company” shall include Heathcote Holdings Limited and all its subsidiaries. Throughout this document, the term “The Company” will be used collectively to refer to these organisations unless otherwise specified.

Introduction

As a business we are very aware of the constantly changing issue of Modern Slavery and Human Trafficking and how it affects all types of sectors and industries. We are very committed to operating our business in a transparent and responsible manner, striving to attain the highest ethical standards and respect for human rights. This includes reducing the risks of modern slavery throughout our business and our supply chain. We take a zero tolerance approach to the issue of any form of Modern Slavery and seek to ensure that all of our employees are observant of any suspicious or concerning activity that may be linked.

Organisational Structure and Supply Chains

Heathcote Holdings Limited is a Kent-based agricultural, plant hire, resource management and recycling specialist delivering a range of specialized resource management services to both private and public sector clients. The Company and its subsidiaries provide services for the recycling of plasterboard, cardboard, plastics, waste wood and the manufacture of refuse-derived fuel and sustainable peat-free compost as well as providing agricultural, plant hire and groundwork services.

This statement covers Heathcote Holdings Limited and all of its subsidiary companies.

Within its supply chain there are relationships with external businesses for the sourcing of waste products and the purchase of plant and equipment. These, as well as the suppliers of service and equipment, make up the supply chains within the Heathcote Holdings group of companies. We work closely with our suppliers to mitigate these risks by taking a transparent, structured, aligned and sustainable approach to tackling Modern Slavery across the Company. This is headed up by our HR and Compliance teams and has the full support of our Management Team.



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Policies on Modern Slavery

We fully support and respect human rights which is a fundamental belief of Heathcote Holdings and its group of companies and as such we do not engage or accept any forms of bonded, forced or child labour. We expect the businesses who work with us to follow these principles and will not knowingly work with those that do not. Further to the issue of the Modern Slavery Act 2015, we have published our **Preventing Hidden Labour Exploitation Policy** which provides clarity to all of our employees, agency workers and agency labour providers on the Company's standards, processes and actions that it commits to take in order to protect workers from the threat of labour exploitation.

We encourage all our employees to report any concerns either internally or via our **Whistleblowing Policy**. This is widely publicised throughout the business.

External Partnerships

As Modern Slavery is a global issue we collaborate with and support industry and global prevention bodies. We continue to have key partnerships with Stronger Together and the Gangmasters and Labour Abuse Authority. We have adopted their guidelines and use their resources in order to develop our principles in tackling Modern Slavery within our business.

Due Diligence Processes — Risk Assessment

The Heathcote Holdings Group of Companies undertakes due diligence when considering taking on new suppliers and regularly reviews their existing suppliers. As part of its due diligence processes into slavery and human trafficking, the supplier approval process and subsequent audits will incorporate a review of the controls undertaken by the supplier. We have undertaken due diligence checks on suppliers in the form of ethical/compliance questionnaires and audits, seeking to support them to achieve the required standards. These processes identify any potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking.

In the next financial year we are committed to undertake the following activities:-

- A review of our current supply chain to ensure the inclusion and raise awareness of the risk of Modern Slavery.
- Raising awareness for all of our suppliers to use the resources of Stronger Together and to adopt their principles and embrace their resources.
- Liaising with industry bodies to ensure compliance in labour standards and in particular Modern Slavery.



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Training and Raising Awareness

We continually work to raise awareness among both our internal employees and our agency labour. We have used the Stronger Together resources in order to do this ensuring all workers are made aware during our induction process within their own language. During the induction we also hold a specific session in relation to Employee Rights. Throughout the business we display multi-language Stronger Together workplace posters in very prominent areas.

We are committed in the forthcoming year to reinforce training and hold regular workshops.

Measuring Effectiveness

We are currently looking at more comprehensive measurements to assess our effectiveness in the area of Modern Slavery. Ensuring a 100% completion of training and understanding for all employees and agency workers is a key target.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Heathcote Holdings Limited Modern Slavery Statement for the financial year ending 30th April 2025.

I the undersigned take responsibility for this statement and represent the Board of Heathcote Holdings Limited and confirm this will be reviewed and updated annually.

T. Heathcote

Trevor Heathcote
Chairman
17th February 2026

Questions regarding this statement or requests for further information should be made to our HR Team.

E-Mail: hr@countrystylegroup.com
Telephone: +44 (0) 1795 413596