



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the financial year ended 30th April 2026

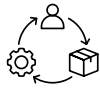


1. INTRODUCTION

This statement addresses the areas set out in Section 54(5) of the Modern Slavery Act 2015, including Grant Engineering (UK) Ltd's organisational structure, policies, due diligence processes, risk assessment, effectiveness measures, and training. It also sets out the steps that we have taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

Modern slavery is a serious violation of human rights, encompassing slavery, servitude, forced or compulsory labour, and human trafficking. Grant Engineering (UK) Ltd is committed to acting ethically and responsibly and to improving transparency within our supply chains and business operations.

This is Grant Engineering (UK) Ltd first modern slavery statement and reflects both the actions we have taken to date and the areas where our approach will continue to develop.



2. OUR ORGANISATION, BUSINESS AND SUPPLY CHAINS

Grant Engineering (UK) Ltd is a supplier of high-quality heating and hot water solutions, specialising in renewable technologies and efficient oil-fired systems for homes across Great Britain.

During this reporting period, we completed Tier 1 supplier mapping, providing visibility of our direct suppliers and the countries in which they operate. Our Tier 1 suppliers primarily consist of manufacturers and service providers operating in the European Union and Asia.

We recognise that visibility beyond Tier 1 has limitations and that continuing to improve our understanding of the wider supply chain is an area for ongoing development.



3. POLICIES IN RELATION TO MODERN SLAVERY

Our commitment to preventing modern slavery is supported by the following policies:

- Ethical Trading Policy
- Whistleblowing Policy

Our Ethical Trading Policy sets out the standards of behaviour expected from employees and suppliers, including commitments to fair treatment, lawful employment practices, and respect for human rights.

Our Whistleblowing Policy provides a confidential mechanism for employees and third parties to raise concerns without fear of retaliation.

These policies are designed to support compliance with UK law and internationally recognised labour standards, including principles set out by the International Labour Organization.

We recognise that our Ethical Trading Policy could be improved to provide greater clarity, we will create two clear Code of Conduct documents covering our business and our suppliers.



4. DUE DILIGENCE PROCESSES

As part of our initial approach to addressing modern slavery risk, we have undertaken due diligence on our Tier 1 suppliers, focusing on:

- Definition of a modern slavery risk matrix
- Supplier location and sector risk
- Supplier declarations relating to labour standards and legal compliance
- Identification of suppliers that may require additional engagement

We have also ensured that modern slavery risk is a core component of our supplier onboarding process. We require suppliers to comply with applicable laws and confirm their operations are free from modern slavery.

Due diligence activity is coordinated by our OEM Product Account Manager, with oversight from senior management. This work provides a baseline from which our due diligence processes will continue to develop over time.



5. RISK ASSESSMENT AND MANAGEMENT

Modern slavery risks vary depending on geography, sector, and workforce arrangements. Based on our Tier 1 mapping and due diligence, we have identified areas where risk may be increased, including:

- Suppliers operating in countries with a higher prevalence of modern slavery
- Use of subcontracted or temporary labour

Our supply chain includes suppliers operating in regions where modern slavery risk is considered higher based on global indices, particularly in parts of Asia. At this stage, we have not identified any confirmed instances of modern slavery in our supply chain.

We acknowledge that not identifying any confirmed cases of modern slavery does not mean there is no risk. Ongoing assessment and increased supply chain visibility remain key priorities.



6. TRAINING AND AWARENESS

To build internal awareness and capability, we have scheduled modern slavery awareness training delivered by a specialist charity in financial year 2026–2027. The training will cover:

- An overview of modern slavery and human trafficking
- Risk indicators and warning signs
- How to raise concerns internally or externally

Training will initially be delivered to staff with responsibility for procurement, supplier management, and people management, with wider awareness activities embedded across the organisation over time.



7. EFFECTIVENESS AND CONTINUOUS IMPROVEMENT

As this is our first modern slavery statement, we are at an early stage in developing measures to evaluate effectiveness. Over time, we aim to introduce appropriate measures, which may include:

- Percentage of suppliers risk assessed
- Completion rate of staff training
- Number of due diligence questionnaires completed

We are committed to continuous improvement and to strengthening both our actions and disclosures year on year.



8. GOVERNANCE AND RESPONSIBILITY

Overall accountability for modern slavery sits with the Board of Directors.

Day-to-day responsibility for implementing actions, monitoring progress, and reporting is held by Head of IT, Transformation & Compliance.



9. APPROVAL AND PUBLICATION

This statement was approved by the Board of Directors on 11th June 2026 and is signed on its behalf by:

Name: Paul Wakefield

Title: Managing Director

Signature:

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Paul Wakefield
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This statement will be published on our website, with a link provided on the homepage, in accordance with Section 54 of the Modern Slavery Act 2015.