

## **Modern Slavery Statement**

### 1. Introduction

This statement is prepared pursuant to the United Kingdom (UK) Modern Slavery Act 2015 for the financial year 2024 of the Cathelco Limited (UK) ("Cathelco"), a fully owned subsidiary of the Cathelco Holdings Ltd which in turn is indirectly owned by the Evac Group Oy ("Group") domiciled in Finland.

Cathelco serves mainly maritime clients globally in managing biofouling, preventing corrosion, and generating freshwater. Our registered office and manufacturing site is in Derbyshire. We seek to maintain long-term business relationships with our suppliers and seek to continue procuring the majority of our materials from suppliers located in the UK. Our current understanding of our upstream suppliers is limited to the tier 1 level.

Cathelco condemns all forms of modern slavery, including forced or bonded labour, child labour human trafficking, and involuntary servitude. We recognise that modern slavery is a grave violation of human rights and a criminal offense under international law. Cathelco is firmly committed to preventing modern slavery from our operations and supply chains.

We recognise our responsibility to uphold human rights and ethical labour practices, and we strive to act with integrity and transparency in everything we do. We recognise that the dignity, freedom, and well-being of every individual are fundamental and non-negotiable.

# 2. Organisational policies

In our own operations, it is important to us to maintain openness and trust. We are committed to conducting our business ethically and with integrity while complying with applicable laws, regulations, and our <a href="Evac Code of Conduct">Evac Code of Conduct</a>. In addition, we are committed to fostering, cultivating and preserving a culture of diversity and inclusion.

As part of the Evac Group, we are committed to human rights as outlined in the United Nations (UN) International Bill of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Ten Principles of UN Global Compact, and the due diligence process as described in the UN Guiding Principles on Business and Human Rights. Our Group policies describing in more details about these commitments include Evac Code of Conduct, Group Diversity and Inclusion Policy as well as our Group Human Rights Policy, which are supportive of our efforts to address Modern Slavery. In the Double Materiality Assessment conducted for the Group in 2024 and disclosed in our Sustainability Report 2024, we identified workers in the value chain as a material topic from the impact materiality perspective driven by potential worker and human rights violations in the upstream value chain.

Cathelco expects our partners and suppliers to use and enforce concepts and practices as outlined in the <u>Supplier Code of Conduct</u> which Cathelco is in the process of implementing within our supply chain. It requires suppliers to comply with labour laws, internationally recognised human rights, and ethical practices and furthermore, the Supplier shall under no circumstances use forced labour or contract with subcontractors or suppliers using child labour or forced labour.



Cathelco treats employees with dignity and respect. The company does not tolerate any discrimination in employment based on an individual's protected status. We monitor working conditions in our own operations frequently, and robust onboarding contains all employee terms and conditions according to the local law. All employees have the right to fair working conditions, competitive wages, and reasonable working hours in compliance with applicable local laws. Workers move around freely and leave their place of work when their shift ends, and it is prohibited to retain workers' identity documents or work permits. Cathelco does not rely on part-time, short-term, or casual labourers, trainees, or false apprenticeships with the intention to pay lower wages or offer fewer benefits

Cathelco opposes to child labour in any form. We recognise that children are entitled to protection, education, and the opportunity to grow and develop in a safe and nurturing environment. We commit to comply with all applicable laws and regulations regarding child labour and will not engage in or support any activities that exploit children for labour purposes.

**Training.** In our own operations, we ensure through our annual mandatory employee training on our Code of Conduct that our employees are trained with better understanding the forms of modern slavery today.

### 3. Grievance mechanisms

Evac Group has established an external third-party managed grievance mechanism, a whistleblowing channel, through which anyone can raise concerns of misconduct in a secure and confidential way. Whistleblower Channel Policy provides further guidance on our website.

## 4. Continuous improvement

We understand that promoting and protecting human rights requires ongoing effort, vigilance, and collaboration. Therefore, we will hold ourselves and our business partners accountable for upholding the principles. Our plan is to establish mechanisms for reporting, investigating, and addressing human rights violations promptly and transparently. Additionally, we will provide further training and awareness programs to our employees to enhance understanding of modern slavery risks and empower individuals to identify and report any suspected cases of exploitation or trafficking.

We are committed to consider our future actions to include proactive measures to ensure that our supply chains are free from modern slavery. We will implement due diligence processes to ensure that our suppliers and business partners uphold ethical labour standards and adhere to applicable laws and regulations related to modern slavery. We plan to conduct risk assessments to identify areas of vulnerability within our supply chains and take proactive steps to mitigate risks of modern slavery. Cathelco initiated a project in 2024 to have our suppliers sign our Supplier Code of Conduct with an aim of completion in 2025. We are committed to introduce Cathelco to Group's available monitoring and auditing mechanisms to identify and address any instances of modern slavery within our supply chain.

In conclusion, Cathelco reaffirms its unwavering commitment to upholding human rights, and we are committed to continuous improvement and will regularly review and update our human rights policies, practices, and procedures to reflect evolving standards and best practices.



We believe that by working together with our stakeholders, we can create a world where every individual is treated with dignity, equality, and respect.

Signed,

Nick Cowley, President of Cathelco & HEM Business Line

Cathelco Limited UK