Finning (UK) Ltd Modern Slavery Transparency Statement

Finning (UK) Ltd. is the UK trading subsidiary of Finning International Inc., one of the world's largest distributors of Caterpillar equipment. Finning UK has a network of branches located across the UK and we currently employ approximately 1600 people. Our core business is the distribution, rental and maintenance of Caterpillar machines, engines, equipment and power solutions in the UK. In addition to Caterpillar equipment, we also supply complementary products and services including technology services, fluid analysis, engineering, systems integration and project management. We operate across a number of different market sectors, including agricultural, construction, energy, marine, oil & gas, defence, quarrying, mining and the waste industry. To find out more about the nature of our business, please see our website: www.finning.com.

Our Commitment

In March 2025, Finning International issued a <u>Joint Modern Slavery Report 2024</u>. In this Report Kevin Parkes, CEO of Finning International, explains that; "We are a company committed to having a positive impact on each other, our customers and the communities where we work. Delivering on this objective includes working with our suppliers so that together we are doing business in a way that supports our communities and does not harm or exploit vulnerable individuals through modern slavery...We have and continue to develop processes to prevent and reduce the risk of modern slavery in our supply chain."

These values are mirrored in the UK business, where we are committed to building a respectful, inclusive and diverse culture where employees are free to enjoy respect and dignity in a safe working environment. We are committed to preventing acts of modern slavery and human trafficking from occurring within both our business and supply chain and we impose those same high standards on our suppliers.

"Living our values means that how we do things is just as important as the thing we do, as such we are committed to building a safe and inclusive team where every member feels valued. We're committed to displaying the highest standards of ethical and moral conduct in all our interactions and ensuring the prevention of slavery and human trafficking within our business and supply chain is a key part of this."

Gary Megarrell, Managing Director of Finning UK.

Modern Slavery and our Supply Chain

Our largest supplier is Caterpillar, who manufactures products in various locations globally. Caterpillar has controls and standards in place within its supply chain, which include adherence to supplier standards, supplier accountability and self-assessment. Within Caterpillar itself, there are robust processes in place to ensure that employees are duly compensated and managed in accordance with the local laws. Also, Caterpillar employees receive code of conduct training and are encouraged to report situations of concern without any fear of reprisal.

Outside of Caterpillar, our main suppliers provide goods and services, such as machine attachments, ancillary equipment, engineering services, parts, logistics, office supplies, facilities management, IT services and professional services.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring

within our supply chain, we have undertaken a risk review assessing categories of supplier in terms of risk of slavery and human trafficking and importance to our business. We are continuously monitoring and developing our approach and an exercise is currently underway to refresh the categorisation of approved suppliers within our supply chain, based on our overall assessment of risk. Currently, all suppliers are required to register with our online supplier portal and are asked to provide confirmation of compliance with the Modern Slavery Act ("Act") as part of the registration process. Our standard terms and conditions used for procurement activities require suppliers to comply with the principles of the Act and we also ask suppliers to comply with our Supplier Code of Conduct. In addition, many of our critical, direct suppliers are required to complete an evaluation questionnaire and, where required, we also carry out a Supplier Assessment Review whereby we carry out a more comprehensive review of supplier processes and procedures.

Other Actions

In addition to carrying out due diligence on our suppliers, we are committed to delivering training sessions to employees on modern slavery and human trafficking issues to keep awareness alive within our organisation.

We are an ISO 9001, 14001 and 45001 accredited business which is demonstrative of our focus on safety, health, environment and quality (SHEQ) and social governance respectively.

Our Policies

As part of our wider commitment to promoting ethical business practices and employee welfare, we also have in place the following policies within our organisation:

- a. Employee Code of Conduct all employees are required to carry out an online learning module and assessment regarding its content. The Code of Conduct requires employees and suppliers to comply with the behaviours and actions as set out in the Code of Conduct including (i) honouring domestic and internationally accepted labour standards and recognising and supporting human rights, (ii) ethical decision-making and (iii) provides a confidential Compliance Ethics Hotline for employees and suppliers to use to report any issues;
- b. Supplier Code of Conduct this requires suppliers to comply with Finning's standards of health and safety, ethics and governance;
- c. Whistle-blower Policy this requires all employees to act with honesty and integrity and makes it a responsibility of all employees to report any non-compliance;
- d. Policies relating to Employee Safeguarding and Wellbeing these various policies provide, for example, that all employees have access to an Employee Assistance Program, employees are protected from for protection from bullying and harassment, and additional safeguarding is in place for young workers;

- e. Health and Safety the culture of health and safety is well embedded within Finning. We have multiple tools for communicating with employees, including:
 - i. A mobile app for employees to record all hazards, near-misses and incidents, which enables us to monitor safety throughout the organisation.
 - ii. Regular communications emailed to all employees to promote the importance of health and safety in the workplace.
 - iii. Local Action Teams formed of employee representatives who regularly undertake reviews of their working environment.
- f. Global Sustainability Policy this sets out, amongst other issues, that we will conduct our business in a transparent, honest, and ethical manner and uphold and protect human rights.
- g. Safeguarding Policy this sets out Finning's approach to safeguarding and promoting the welfare of children and vulnerable adults. It applies to all departments and areas of work.
- h. Work Experience Policy this sets out Finning's approach to taking on people on work experience placements, from work experience students under the school leaving age to apprentices aged 18 or over and to vulnerable adults. It applies to all departments and areas of work.
- i. Training Academy our award winning apprenticeship program is regulated by Ofsted and we are subject to regular inspections to ensure that we are providing quality education and safe learning environments for our engineers of the future.

We are not aware of any instances of modern slavery or human trafficking within our organisation or supply chain. We will continue to develop our policies, training and effectiveness, and our approach to supplier management specifically, in order to improve our company's approach and ensure ongoing progress to tackling modern slavery and human trafficking.

This statement has been prepared and approved by Finning (UK) Ltd. in accordance with Section 54(1) of the Modern Slavery Act 2015 and relates to the financial year ending 31 December 2024.

Gary Megarrell Managing Director Finning (UK) Ltd.

2025