LAWTON TUBES
The nations copper specialist

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Modern Slavery and Human Trafficking

5th February 2026

Introduction from the Managing Director

Slavery and human trafficking are blight on our global society and we will not tolerate forced labour of any sort within our operations. We all have a responsibly to be alert to the risks, however small, both in our businesses and in the wider supply chain. Employees are expected to report any concerns and management are expected to act upon such concerns without delay.

Modern Slavery and Human Trafficking Statement

This Statement is prepared in order to give guidance and instruction on the minimum standards acceptable to our UK businesses in the manufacture of components and raw materials supplied to our companies and of finished products.

The Company recognises its moral and legal responsibility with regards to modern slavery and human trafficking and will endeavour to ensure no such activities arise in the operation of our business. Our aim is to achieve the highest ethical standards with regards to modern slavery and human trafficking and as a minimum, we will comply with all relevant legislation and we will achieve this with the cooperation of all our staff. All our UK businesses comply with Lawton Tube Ethical Code of Practice for Supply Sites Outside of the European Union.

Continual improvement in the area of business ethics is supported by the measurement of our performance by internal auditing and reporting. Additionally, Management will periodically review this policy and will do so especially in the event of any major organisational changes, new legislation or serious breaches of the policy.

The Organisation

Within the UK, our business manufactures and distributes copper tube and associated products for the heating, plumbing, refrigeration and engineering industries.

Our Supply Chains

Our supply chains include local, national and international partners and the Company will not knowingly do business with parties who violate applicable laws and regulations, including local, environmental and employment laws.

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Business Objectives

1. The elimination of modern slavery and human trafficking within our business operations through effective corporate governance.

2. The provision of effective training relating to modern slavery and human trafficking issues for all relevant personnel ensuring all relevant personnel understand their role and expected behaviour.

3. To ensure modern slavery and human trafficking is an agenda item at Executive meetings on an annual basis so that the above arrangements remain suitable for the needs of the business.

4. To ensure that adequate resources are made available to meet these objectives.

Assessment

The assessment encompasses the following auditing strands:-

Social: covering the health and safety of employees, working conditions, labour relations, career management, child and forced labour, freedom of association.

Ethics: covering corruption and bribery, anti-competitive practices, fair marketing.

Environment: covering energy, water, biodiversity, local pollution.

It is the intention of the Company to achieve and maintain, as a minimum, standard compliance in respect of this assessment. It is a requirement that all suppliers submit to assessment and achievement of the basic standard and it is the intentions of the Company to have all of its suppliers achieve at least the minimum standard of compliance in respect of the assessment.

The assessment enables us to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide ongoing training to relevant personnel.

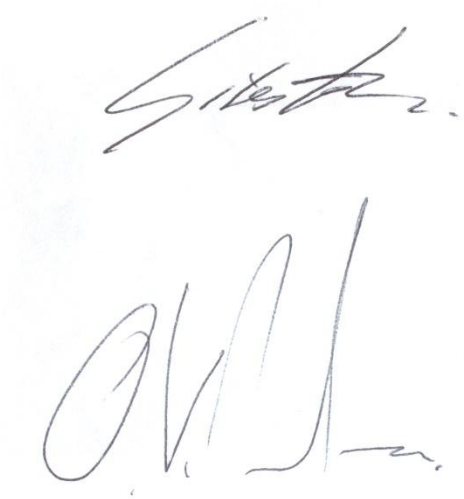
Protection

Employees, agency workers and contractors who wish to raise any issues with regards to the Company's business practices, in particular those relating to modern slavery and human trafficking, can do so under the protection of the Company's Whistleblowing Policy. Such matters can be raised with either a manager, a member of the Human Resources Team or a relevant external agency including the Police, Public Concern at Work and any Public Authority.

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Review This statement, the Company's Modern Slavery policy and relevant procurement practices are reviewed on an annual basis and the Company is committed to communicating changes effectively.



Joint Managing Directors

February 2026