**Modern Slavery Statement 2026**

EWIE Europe Limited is committed to conducting business with integrity and creating a working environment where everyone can be at their best. This includes upholding policies and processes to mitigate the risk of modern slavery, including forced labour, human trafficking and child labour, in our operations and supply chain.

The policies and processes referred to in this statement apply to the EWIE Europe Limited as reporting under the UK's Modern Slavery Act 2015

**Our business structure, activities and supply chains**

EWIE Europe Limited provides indirect materials and services, focused on driving innovation, cost savings, throughput and reducing spend. We specialize in delivering year over year savings by managing cutting tools, abrasives and industrial supplies.

We operate in the UK, France, Germany, Romania, Singapore, Belgium and Czechia, with our headquarters in the UK.

The company generates revenue through our commodity management services which includes supplying industrial tools and supplies to large manufacturing and OEM customers.

We rely on a global supply chain to provide the products to our customers. Globally, as part of the EWIE Group of Companies, we manage over 12,000 suppliers and manage over 1.5 million items. We work directly with suppliers across the globe, primarily specialist engineering and manufacturing organisations, as well as service providers such as business service support agencies and law firms.

The Board has ultimate accountability for managing the risk of modern slavery.

Our commitment to protecting and preserving all recognised human rights, including our position on forced labour, involuntary labour, child labour and human trafficking, is outlined in our internal Code of Conduct, and also our Supplier Code of Conduct.

## Our Code of Conduct

Our Code of Conduct sets out our principles relating to human rights and modern slavery through reference to international standards, including:

- We take responsibility for protecting and preserving the human rights of our employees and contract workers in our own activities and operations;
- We expect our suppliers, contractors, joint ventures and other partners to protect and preserve human rights in their activities and operations;
- We are committed to acting in an ethically, environmentally and socially responsible manner, complying with applicable laws, and respecting the human rights of communities affected by our operations and supply chain operations;
- We believe that all employment should be freely chosen and refrain from any form of forced or involuntary labour or human trafficking;
- We are opposed to the use of any form of child labour or practices that inhibit the development of children;
- We are alert to the risks vulnerable people may face and seek to ensure that this group is free from discrimination and exploitation; and
- We will only work with suppliers whose core values and commitment to ethical business conduct matches our own, and we require that their conduct always meets our standards.

Our Code of Conduct underpins all that we do as a company by setting out our principles and how they apply to our business activities. It applies to all employees, wherever they are located. All employees are required to adhere to our Code, in addition to any specific local requirements.

## Our due diligence processes related to modern slavery

We extend our sustainability expectations and ethical principles to our suppliers through our Supplier Code of Conduct. In order to do business together, we expect all suppliers to be ethical, responsible and to fully comply with all applicable laws and regulations. Our Supplier Code of Conduct sets out the behaviours, practices and standards we expect our suppliers to demonstrate and comply with.

Partnering with EcoVadis, a leading third-party provider, we conduct an annual sustainability assessment to understand the inherent sustainability risks within our supply chain and take appropriate mitigating actions where required.

**Identifying, assessing and mitigating modern slavery risks**

We identify, assess and mitigate modern slavery risks in our operations and in our supply chain through our human rights risk assessment framework. That framework includes:

- Due diligence policies and processes for identifying, addressing and prohibiting the use of modern slavery including forced labour and child labour in our activities and supply chains;
- Implementation of our Code of Conduct and Supplier Code of Conduct
- A Whistleblowing Policy internal stakeholders to raise any concerns they may have about human rights issues;

In our business operations

The process of identifying, assessing and mitigating human rights risks and impacts in our business operations is embedded in our management systems and processes. Our management teams are responsible for ensuring compliance with local laws and regulations, including those relating to human rights and modern slavery. Our teams work with the business leaders to ensure compliance with our Code of Conduct.

We foster safe working environments where everyone feels valued and able to speak up and to raise questions or concerns without fear of negative consequences. This is a vital part of enhancing our culture of respect and belonging.

In 2025, no concerns were raised related to modern slavery, forced labour, child labour or human trafficking. We consider our exposure to modern slavery risk to be relatively low.

In our supply chain

Our Supplier Code of Conduct is the foundation of our approach to managing modern slavery risk within our supply chain. Suppliers must:

- Operate their business in a way which respects human rights, dignity and fundamental freedoms.
- Not use child labour or any form of forced, bonded or involuntary labour, or engage or participate in any way in slavery or human trafficking.
- Not ask their employees or workers to pay recruitment fees.
- Not confiscate, destroy, conceal, and/or deny access to workers' passports or other identity documents.
- Not engage in activities intended to restrict worker freedom of movement.
- Ensure that all work is conducted on a voluntary basis and employees are free to terminate their employment by giving notice in accordance with the terms of their employment.
- Comply with all applicable labour laws and regulations, and internationally accepted standards of workers' rights.
- Provide employees and workers with clean toilet facilities, potable water, and sanitary eating facilities.

Adherence with our Supplier Code of Conduct is required for all new suppliers and has been rolled out to existing suppliers also This is in addition to the requirement for suppliers to comply with all applicable laws and regulations in the country or countries where our suppliers operate.

We assess risk based on self-reporting by suppliers and reserve the right to audit and ensure compliance with our Supplier Code of Conduct.

**Training our people**

We make clear to all employees across our global footprint the ethical standards we expect them to adhere to in our Code of Conduct. All employees must read and acknowledge the Code of Conduct and mandatory training regarding business ethics is part of our induction process. We track completion of this training as part of our people metrics.

**How we measure the effectiveness of our processes**

We seek to take relevant legislation and the views of internal and external stakeholders into account in the development of any company policy. Any proposed new policy or revisions to an existing policy is subject to review and approval by the directors.

We also measure the effectiveness of, and compliance with, our policies and processes by reference to the number of modern slavery incidents identified in our own operations and in our supply chain, or concerns about modern slavery raised through our Whistleblowing Policy each year. In 2025, we had no known, formally-reported modern slavery incidents in our own operations or our supply chain that would qualify as severe human rights impacts, and no modern slavery concerns were raised.

**Attestation Statement**

This statement has been made for the year ending 31 December 2026 in accordance with the reporting requirements of Section 54, Part 6 of the UK's Modern Slavery Act 2015.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Acts, for the reporting year listed above.

I have authority to bind EWIE Europe Limited.

Signed



Rick Mullick
Director

EWIE Europe Limited

Date: 02 October 2026