DURNBURY LTD

30 First Avenue , Bluebridge Industrial Estate, Halstead, Essex, CO9 2EX *Registered Office Address*

Telephone: 01787 475351 Fax: 01787 477821 Email:info@durnbury.co.uk
Website: www.durnbury.co.uk

Our Ref: MSHT/FDJO/26
Date: 28th September 2026

Modern Slavery and Human Trafficking Policy and Statement

Policy Statement

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1.0 Introduction

The Modern Day Slavery Act 26 March 2015 deals with a variety of matters relating to slavery, servitude and forced or compulsory labour and human trafficking from supply chains and business activities. The Act requires business to disclose what activities have been undertaken to eliminate slavery and human trafficking. The key purpose of this Act and the company's policy and statement is to prevent modern slavery in this organisation and supply chains. Increased transparency by ensuring the customers, suppliers, members of the public, employees and investors know what steps this company has taken to tackle modern slavery.

2.0 The Modern Slavery Act 2015

The Modern Slavery Act 2015 imposes the responsibility on employers to ensure that all employees are not in breach of the 'Anti-Slavery and Human Trafficking Rules'.

The National Crime Agency, the police and other law enforcement agencies have the powers to pursue, disrupt and bring to justice those engaged in human trafficking, slavery, servitude and forced or compulsory labour.

Penalties and prison sentences can be imposed on employers who knowingly break these rules.

3.0 Elements of the Offence

The legislation is very clear, if a business fails to produce a 'Slavery and Human Trafficking Statement', for a particular financial year the Secretary of State may seek an injunction through the High Court, requiring the company to comply. If the organisation fails to comply with the injunction, they will be in contempt of a court order, which is punishable by an unlimited fine.

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4.0 Overview of The Modern Day Slavery Act

The act includes provisions to:

- The identification of and support of victims enable the Secretary of State to make regulations to ensure the prevention of modern-day slavery.
- Make provisions for independent child trafficking advocates
- Encourage the courts to compensate the victims where assets are confiscated from perpetrators.
- Close loopholes and gaps within the law, to enable law enforcement to stop boats, where slaves are suspected of being held or trafficked,
- Require businesses to disclose each year what action they have taken to ensure there is no slavery in their business or supply chain
- The Transparency in Supply Chain Clause (Clause 6) requires organisation to report on the processes and care taken to ensure that their supply chains are slavery free.

5.0 Slavery and Human Trafficking Statement

Durnbury Ltd is committed to the responsibility and has zero tolerance for slavery and human trafficking. Durnbury Ltd has set standards on social, environmental and ethical issue in the extraction systems (LEV's) and industrial vacuum supply chain; to which we hold ourselves and our supply chain accountable.

Durnbury Ltd prohibits the use of slavery, use of forced, bonded or indentured labour, involuntary prison labour or trafficking of persons. This includes debt bondage.

Durnbury Ltd will consider each supplier's conduct and support when awarding and/ or renewing business with the supplier. Any violation on the global labour principles and human rights standards will have automatic suspension from our supplier chain. These principles are to strengthen the commitment to the rights of our employees, workers in our supply chain.

It reinforces the human rights of workers in the global community.

The Company recognises the importance of operating to a set of core values in the way that it carries out its business with its customers and supply chain organisations. These cores values seek to establish, protect and increase the trust and confidence of individuals and organisations with whom the Company interacts thereby enhancing the Company's reputation and its successful business dealings. Company procedures and the approach to business arising from this policy are to be applied by all of its employees in the course of their work activities, as well as across the company's suppliers and sub-contractors. The core value is zero tolerance for slavery and human trafficking.

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To achieve these aims the Company requires its employees, sub-contractors and all members of our supply chain to:-

- To apply high ethical standards in their relationships with customers, suppliers, sub-contractors, competitors and the local community at all times.
- To report any suspicions of slavery and human trafficking to their line manager. Contact the National Crime Agency, the police and other law enforcement agencies who have the powers to pursue, disrupt and bring to justice those engaged in human trafficking, slavery, servitude and forced or compulsory labour.
- To report any offer of monies or gifts of significant value to their line manager.
- To develop good working relationships with the Company's employees, suppliers, customers and sub-contractors based on fair working practices, not making unreasonable demands in the diligence processes; in relation to slavery and human trafficking.
- To respect the local traditions and culture within the country or region in which they are, being diligence in relation to slavery and human trafficking in business and supply chains.
- Operating and advising against slavery and human trafficking.
- Not to give or receive monies or gifts of significant value intended as an inducement or bribe; to hide slavery or human trafficking.
- To comply with all laws and local regulations within the country or region in which they are operating.
- To support these aims the Company will endeavour to: -
  a) Ensure adequate resources are available to implement the requirements of this policy
  b) Make this statement available to the public
  c) Review and update this policy during annual management reviews.
- To apply verification and Risk Assessments
  The internal assessment our supply chain, indicated that the company had a low risk. Most of our suppliers were either UK or European based. Any new supplier or renewal of an existing supplier will have to fill out a 'Sub-Contractors Quality Assurance Form', which has amendments and has a zero tolerance to slavery and human trafficking.
- To provide training to employees. In-house training will be provided to all employees on slavery and human trafficking

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The cooperation and involvement of employees at all levels is essential for the effective implementation of this policy. This policy will next be reviewed during **September 2026.**

Date: 28th September 2026 **Review Date: September 2027**

Signed

Mr F. Di Betta

Signed

Miss J Orlandini

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