CARTER SYNERGY LIMITED
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement sets out Carter Synergy Ltd actions to understand all potential Modern Slavery and Human Trafficking risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the reporting year which is from April 2026 through to March 2027.

Carter Thermal Industries is a privately owned UK engineering group with a long-established presence in the refrigeration, HVAC, building services and associated manufacturing sectors. The Group comprises a number of specialist businesses, including Carter Synergy, Carter Retail Equipment, Carter Cold Stores and Franklin Hodge Industries, providing products, engineering services, installation, maintenance and technical solutions to customers across the UK and international markets.

Our activities are supported by a diverse supply chain encompassing manufactured equipment, components, raw materials, specialist subcontractors and professional services sourced both within the UK and overseas.

Carter Synergy Ltd is the Group entity required to publish a Modern Slavery Statement under the Modern Slavery Act 2015. However, this statement is intended to reflect the approach, expectations and commitments applied across the wider Carter Thermal Industries group and its supply chain.

The Company currently operates in the following countries:

- Distribution, installation & service of OEM Manufactured Product throughout the UK
- Export of UK manufactured / assembled product throughout the UK, Eire, and the United States through one of the group subsidiaries, Carter Retail Equipment Ltd.
- Inbound Supply Chain is predominantly from within the UK with global supply from: Switzerland, Sweden, USA, China, Australia, New Zealand, Netherlands, Poland, Italy, Germany, Portugal, France, Ireland, Romania, Czech Republic.

Our Commitment

During the reporting year 1st April 2026 to 31st March 2027, we commit to ensure:

- For all directly employed employees, we will carry out 'Right to Work in the UK' checks and pay minimum wages or above in accordance with published UK government legal guidelines in respect of National Minimum and National Living Wage. This now includes the changes effective from October 2026 to the "Right to work checks".
- For all indirect workers we will continue to carry out a Health & Safety and contract familiarisation prior to their acceptance as a sub-contractor, at which we are able to check their identity, qualifications and competence. This now includes the changes effective from October 2026 to the "Right to work checks".
- We co-operate with our clients through regular client audits of our obligations under this policy and undertake to support the client through effective supply chain management.
- We continue to review and revisit our supply chain partners (950), carrying out rolling review to include identification of their individual approaches / commitment to Modern Slavery and

Human Trafficking within their Supply Chains to include their countries source(s) of materials, and their labour resources in support of our business operations to identify all and any potential areas / countries of risk. In support of this we are now also using the SEDEX platform to support compliance and the audit of sites outside of our or UK jurisdiction.

- We predominantly operate within the UK with the majority of our supply chain partners also based in the UK and we therefore consider the overall risk of slavery and/or human trafficking to be low.

Risk assessments

The Procurement department supported by other as needed will assess the risk of slavery or human trafficking within the supply chain as part of the Company's overall Risk Management and Governance.

High Risk Activities:

We plan to conduct a rolling risk assessment of all our supply chain activities across the business, including those overseas countries where there is considered to be a greater material risk of slavery or human trafficking in line with published Government figures. Where we identify a material risk, we will conduct supply chain assessment audits to ensure compliance with the agreed policies.

It is the intention of Carter Synergy Ltd to implement updated supply chain processes including compliance checks to ensure our partners meet or exceed our modern slavery and human trafficking policy requirements.

Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy: The Company encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can raise a concern with the CTI Group HR Director.

Employee code of conduct: The Company's code of conduct makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. All employees are provided with a copy of the Ethical and Business Conduct Handbook upon commencement of employment which they are requested to read through and confirm is understood. Training takes place for key roles across the business on a periodic basis.

Purchasing & Supply Chain code of conduct: The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary (RAMS), treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

Recruitment/Agency worker's policy: The Company uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency in accordance with the CTI Group Recruitment policy.

Due Diligence

The Procurement department is responsible for ensuring the Company's policies are communicated to the supply chain partners and form part of the supplier assessment process, which is managed by the Internal Audit with support from others as required.

- Develop and implement a group wide Environmental, Social and Governance policy. This was achieved by the issue of our first report in 2024. This report is issued annually.
- Creation within 2025 of a group wide Sustainable Procurement Policy Statement.
- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Reviewing, on a regular basis, all aspects of the supply chain based on the supply chain mapping
- Conducting supplier audits or assessments through our Compliance Team
- The use of the SEDEX where appropriate within our wider business global supply chain.
- Taking steps to improve substandard suppliers' practices
- Participating in collaborative initiatives with our customers for example "Stronger together" or "Ethical trading"

  https://www.stronger2gether.org/resources/
  https://www.ethicaltrade.org/about-eti/our-members

Key Performance Indicators

The Company has reviewed its key performance indicators required in accordance with the policy, as a result, the organisation is to achieve the following within the next two financial years:

- All staff involved within any element of Purchasing or Supply Chain, to have completed training on Modern Slavery and Human Trafficking
- Further develop the system for supply chain verification where the organisation evaluates potential suppliers before they enter the supply chain.
- Further enhance and develop our review of external suppliers and subcontractors.

Training

All staff working in the procurement team within the organisation will be required to complete training on modern slavery and human trafficking awareness and understanding. This will include distribution and understanding of all available materials from the gov.co.uk website as well as video and reading materials available from the IASC (Independent Anti-Slavery Commissioner).

Review:

This policy will be reviewed and approved on an annual basis by the, Carter Synergy Managing Director, HR Director and the Procurement department.

Director signature: *James Anderson*

Name: James Anderson
Position: Managing Director, Carter Synergy
Date: 24th August 2026