



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Our commitment to the principles of the Modern Slavery Act 2015

Euroforest Holdings Ltd, together with all its operating divisions and subsidiary companies (collectively referred to as the “Euroforest Group”), is committed to taking appropriate and proportionate measures to ensure that modern slavery and human trafficking do not occur within its business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Euroforest Group’s slavery and human trafficking statement for the financial year ending 28 December 2024.

This statement was approved by the Board of Directors on 11 June 2025. The information contained herein is accurate as of the date of publication.

About Euroforest

The Group as of 11th June 2025 comprises of the following businesses:

Euroforest Limited (Euroforest Timber Marketing and Euroforest Arboriculture)

Euroforest Limited provides timber marketing services to forest owners. The Company markets over 2.5 million cubic metres of round timber & forest residues every year. The harvesting service covers both standing trees and roadside purchases encompassing line and selective thinning, through to clear felling at the end of rotation.

Euroforest Arboriculture delivers tree management solutions, from individual tree removals to large-scale operations on road networks and for utilities companies and environmental groups.

Euroforest supplies the entire UK market, from small-scale millers through to the largest processing operations, as well as several Scandinavian pulping operations and biomass renewable energy plants.

Sheffield & Company Limited (Euroforest Haulage)

This company specialises in modern haulage logistics.

Pryor & Rickett Silviculture Ltd (Euroforest Silviculture)

Pryor & Rickett Silviculture specialises in delivering silvicultural services tailored to clients’ specific needs, such as woodland creation, woodland management, conservation and investment support.

Euroforest Timber Ireland Limited

This is a comparative business providing harvesting and marketing services to the forest

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industry in Ireland.

Baltfor Trading OÜ (Euroforest Baltic Trading)

This company specialises in supplying certified roundwood from Estonia and the Baltic States to the UK market (shipping and bulk storage).

Blacklock Harvesting Limited (Euroforest Harvesting)

This is a company which specialises in advanced mechanised timber harvesting.

Our Supply Chain

The Euroforest Group is committed to ensuring that modern slavery and human trafficking do not occur within any part of our business or supply chains.

Our supply chains comprise a broad network of third-party providers, predominantly small and medium-sized enterprises (SMEs). Key services supporting our core operations include timber harvesting and haulage, alongside suppliers of IT services, software and hardware, office products, and cleaning services.

We maintain a strict zero-tolerance policy towards slavery and human trafficking. The Group will not engage with any organisation, whether operating in the UK or internationally, that knowingly supports or is found to be involved in slavery, servitude, forced labour, or any form of compulsory labour.

This commitment forms an integral part of our due diligence process, reflecting our broader approach to responsible business and ethical sourcing.

Our Policies in relation to the Modern Slavery Act 2015

The Euroforest Group is firmly committed to conducting all business activities with the highest standards of ethics and integrity. We implement and maintain robust systems and controls designed to prevent any occurrence of slavery or human trafficking within our operations and throughout our supply chains.

All internal policies are subject to regular review to ensure their continued relevance, effective communication, and alignment with the Modern Slavery Act 2015 and other applicable legislation, thereby promoting ongoing compliance across the Group.

Business Ethics Policy: This policy is intended to ensure that the Euroforest Group conducts all business activities responsibly, ethically, and in accordance with the highest professional standards. It sets out the core principles that underpin the Group's ongoing commitment to ethical conduct and responsible business practices.

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The Euroforest Group maintains a clear and consistent approach to integrity and ethical behaviour, which is embedded in our values and reflected in the way we operate across all areas of the business. These standards guide our decision-making, shape our relationships with stakeholders, and support our commitment to sustainable and transparent operations.

Whistleblowing Policy: The Euroforest Group actively encourages all employees to report any concerns relating to unlawful, unethical, or inappropriate conduct — including any suspicions or evidence of modern slavery or human trafficking.

The Group's Whistleblowing Policy is in place to ensure that such concerns can be raised in a safe, confidential, and supportive environment. All reports made under this policy are treated seriously and will be investigated thoroughly, promptly, and with the utmost discretion. No employee will suffer any detriment as a result of raising a genuine concern in good faith.

Equal Opportunities: The Euroforest Group is committed to fostering a working environment that promotes equality of opportunity and is free from unlawful discrimination, harassment, and victimisation. This commitment applies irrespective of an individual's race, sex, pregnancy or maternity status, marital or civil partnership status, gender reassignment, disability, religion or belief, age, or sexual orientation.

We strive to ensure that all employees, job applicants, and individuals engaged with the Group are treated fairly, with dignity and respect, and are provided with an inclusive environment in which they can thrive and contribute to the success of the Company.

Fair and Ethical Recruitment: The Euroforest Group ensures that all recruitment practices are fair, transparent, and conducted in a manner that promotes equal opportunity and safeguards against exploitation.

All recruitment, whether for internal or external candidates, is carried out in a consistent and professional manner, based on merit and in compliance with relevant employment and equality legislation. We actively promote a non-discriminatory approach and uphold the rights and dignity of all individuals throughout the hiring process.

Where third-party recruitment agencies are used, we engage only with reputable agencies who are required to comply fully with UK employment law. This includes conducting appropriate right to work checks and ensuring that all individuals are recruited voluntarily and without coercion. The use of recruitment fees or practices that could contribute to debt bondage is strictly prohibited.

Right to Work Checks: The Euroforest Group implements robust right to work checks for all employees in accordance with UK Home Office guidance. These checks are designed to ensure that all individuals employed within our business have the legal right to work in the UK and

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are not subject to immigration restrictions that would prevent them from undertaking the role.

Where an individual's right to work is time-limited, we carry out additional verification to ensure that appropriate documentation is renewed prior to their expiration date. This helps to prevent any situation in which an employee could be placed at risk due to the expiration of their legal working status.

All verified documentation relating to right to work checks is securely retained for a minimum of 2 years after the individual has left the Company.

Risk Assessment of our Supply Chain

The Euroforest Group takes a risk-based approach to assessing and managing the potential for modern slavery and human trafficking within its operations and supply chains. Overall, the Group considers its supply chain to present a **medium risk**, recognising that certain factors — such as the involvement of overseas subsidiaries and the potential use of unskilled labour — may elevate exposure to ethical and legal risks.

Our core operations within the UK and Ireland are considered to be **low risk**. The majority of our activities are domestically based, with minimal reliance on imports. Furthermore, the use of unskilled labour is limited, and all suppliers are expected to comply with UK legislation, including laws prohibiting forced or compulsory labour.

In particular, Euroforest Harvesting relies on a workforce of highly skilled professionals to operate specialist machinery. These individuals are subject to close supervision to ensure full adherence to the Group's policies and ethical standards.

We expect all suppliers, contractors, and business partners to comply with our values and uphold the highest standards of ethical conduct. Contracts and engagement terms require compliance with all applicable anti-slavery and human trafficking laws.

Effectiveness in Combating Slavery and Human Trafficking

The Euroforest Group takes all allegations or suspicions of modern slavery and human trafficking with the utmost seriousness. Any suspected incident is escalated immediately to the Executive Board for review and action. Appropriate steps are then taken in line with the nature and severity of the issue. These may include, but are not limited to, the termination of commercial relationships, the initiation of disciplinary procedures, and the notification of relevant regulatory or enforcement authorities.

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During the 2024–2025 reporting period, the Euroforest Group undertook a number of measures to strengthen our approach to combating modern slavery and human trafficking:

- Reviewed and updated relevant internal policies to enhance safeguards and clarify expectations.
- Expanded our training programme to include biannual refresher sessions for relevant personnel, reinforcing awareness and vigilance.
- Improved the frequency and scope of subcontractor reviews to ensure ongoing compliance with our ethical standards and legal obligations.

These actions reflect our commitment to continuous improvement and the proactive management of modern slavery risks across our operations and supply chains.

Our Commitment to Embedding the Principles

The Euroforest Group has undertaken a thorough review of its key performance indicators (KPIs) to ensure full compliance with the Modern Slavery Act 2015 and to effectively monitor our efforts to prevent modern slavery within the organisation.

As part of our ongoing commitment to eradicating modern slavery, we will implement the following actions during the 2025–2026 period:

- **Supplier Terms & Conditions:** We will conduct regular, comprehensive reviews of the Group's standard Supplier Terms and Conditions to ensure the explicit inclusion of modern slavery contractual obligations, thereby reinforcing compliance expectations across our supply chain.
- **Employee Awareness and Recruitment Training:** We will continue to enhance awareness of modern slavery issues among all employees through structured training delivered via our EdApp platform, supplemented by toolbox talks, site monitoring and rigorous contractor assessments. Additionally, targeted training will be provided to recruiting managers to ensure they are fully equipped to identify and mitigate modern slavery risks during the hiring process.
- **Standards Implementation:** We will advance the rollout of ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and ISO 45001 (Occupational Health and Safety) standards across the Group, further embedding industry best practices and strengthening our operational integrity.

For any enquiries relating to this statement, please contact Michael Babester, Company Secretary at michael.babester@euroforest.co.uk on behalf of the Euroforest Group.



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Signed:

A handwritten signature in black ink, appearing to read "David Symons", written over a light grey rectangular background.

David Symons
Managing Director

Date: 11th June 2025

Euroforest Holdings

Euroforest Harvesting reported to Companies House as Blacklock Harvesting Ltd

Euroforest Silviculture reported to Companies House as Pryor & Rickett Silviculture Ltd

Euroforest Marketing reported to Companies House as Euroforest Ltd

Euroforest Haulage reported to Companies House as Sheffield & Co Ltd