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Modern Slavery Statement 2024:

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes H+H UK Limited's statement for the financial year ending 31 December 2024.

The statement describes the initiatives and considerations that H+H UK Limited in conjunction with the parent company in the H+H Group, H+H International A/S located in Copenhagen, Denmark, has taken to minimise the risk of slavery and human trafficking taking place in H+H UK Limited and in its supply chains.

About H+H UK Limited and H+H Group:

H+H UK Limited produces and sells aircrete building blocks and aircrete panels used for the construction of houses. H+H UK Limited's head office is in Borough Green, Kent and the three manufacturing facilities are based with one plant in Kent and two plants adjacent to each other in Yorkshire. H+H UK Limited employs approximately 230 employees.

H+H UK Limited is via direct and indirect holdings ultimately held 100% by H+H International A/S (Danish company reg.no. CVR 49619812 and located at Lautrupsgade 7, 5th floor, 2100 Copenhagen, Denmark), a holding company with its shares listed on NASDAQ OMX Copenhagen.

H+H International A/S also owns companies producing and selling aircrete products and/or calcium silicate products in Germany, Poland and Switzerland and sales companies in Denmark, the Netherlands and the Czech Republic. There are currently 24 plants and approximately 1,300 people employed in the H+H International Group.

H+H International A/S issues an annual sustainability report in accordance with EU's Corporate Sustainability Reporting Directive and including reporting on social factors. The report is assured by a qualified sustainability auditor elected by the shareholders at a general meeting.

H+H UK Supply Chain:

H+H UK Limited mainly utilises a local supply chain from within the UK and often close to the plants for goods and services due to the need for continuous and often speedy delivery of products and services and in regard to the supply of raw materials such as sand, lime, water etc., also to limit transport and thereby costs and reduce greenhouse gas emissions. Energy is also sourced locally.



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Policies related to Slavery and human trafficking:

H+H Group has publicly declared its Purpose and Promises. (www.HplusH.com/](http://www.HplusH.com/) /en/about-hplush/partners-in-wall-building)

The Purpose being:

To enable better homes for our communities

One of the Promises being:

Putting people first

The health and safety of our people, suppliers and customers, will never be compromised. We are committed and have the ambition of zero harm for our own and our partners' people. We know that people are different. We trust our differences enable us to see new opportunities and be more effective. People are the heart of H+H.

In addition to H+H's Purpose & Promises, H+H has the following group policies related to combatting slavery and human trafficking:

(www.HplusH.com/en/compliance)(http://www.HplusH.com/en/compliance)

Code of Conduct

In the Code of Conduct's chapter on "People" there is a "Human Rights" section which explicitly states the we do not accept the use of human trafficking, forced or compulsory labour or the use of child labour. Further it is stated that we extend our support for the human rights described to also encompass a general expectation that our suppliers respect the protection of internationally proclaimed human rights.

Code of Conduct for Suppliers

In the Code of Conduct for Suppliers' chapter on "People" there is a "Basic employee rights" section which explicitly states that H+H expects our suppliers to not accept the use of forced or compulsory labour or the use of child labour, and likewise to ensure that there is no modern slavery or human trafficking in any part of the supplier's supply chain and to take all reasonable practical steps to prevent modern slavery.



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Further it is stated that H+H will not tolerate any breach of the Code of Conduct for Suppliers and that H+H may terminate the contract with suppliers that violates the Code of Conduct for Suppliers or refuses, if asked, to take part in a remediation plan. It is also stated, it is very important that the supplier speaks up immediately if the supplier becomes aware of or suspects any violations, so that H+H can act in due time. Suppliers are encouraged to report to their point of contact within H+H, or if circumstances are such that the individual from the supplier prefer to report in confidence, then to report the concern – anonymously or non-anonymously – through H+H's online whistleblower system available from all H+H websites.

Human Rights Policy

H+H is committed to adhering to the human rights as set out in the UN Global Compact signed by H+H, which set out universally accepted principles in, amongst others, the areas of human rights and labour. The policy explicitly states that H+H does not tolerate any form of forced labour such as slave labour or human trafficking. H+H will not accept any situation where a person working for H+H is exploited in that the person cannot refuse or leave because of threats, violence, coercion, deception or abuse of power. Also, H+H does not tolerate hiring of child labour. The minimum age for full-time employment is 15 years or the legal minimum age for employment under applicable local law, whichever is higher. H+H is committed to identifying potential and actual compliance breaches to help prevent, mitigate or remedy such non-compliance and the impact it may cause.

Whistleblower Policy

In support of H+H's commitment to legal, responsible and ethical business behaviour, we have an open culture allowing employees, business partners such as suppliers and other stakeholders to speak freely and report believed wrongdoing or unlawful conduct. This can be done to the person's H+H manager or point of contact in H+H, and in situations where that is not possible, or where it feels uncomfortable to report via the normal communication channels, then via H+H's online whistleblower system EthicsLine available from all H+H websites. The system is provided on a secure external website by a specialist third party provider and reports can be submitted anonymously and communication can take place through a secure mailbox established via the system for the reporter. H+H has zero tolerance for retaliation against whistleblowers and witnesses and retaliation will lead to disciplinary actions or termination of employment or contracts with H+H against anyone retaliating.

Finally, H+H UK Limited has the following policy related to combatting slavery and human trafficking.



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Modern Slavery and Human Trafficking Policy

H+H UK Limited is committed to upholding ethical standards and maintains a zero-tolerance stance on all forms of modern slavery, including forced labour, servitude and human trafficking. This policy sets out the company's commitment to preventing such practices across its business operations and supply chain.

All individuals working with or on behalf of H+H must remain vigilant and report any concerns regarding suspected modern slavery. Reports made in good faith will be fully supported and treated in confidence. In accordance with Section 54 of the Modern Slavery Act 2015, H+H publishes an annual statement detailing the actions taken to uphold these commitments.

Full details can be found in H+H UK Limited's Modern Slavery and Human Trafficking Policy.

Methods to identify, assess and manage risks of modern slavery and human trafficking

To identify sectors and supply categories with high modern slavery risks, H+H relies on the following indicators generally known to increase risk likelihood:

- Country of manufacture
- Reliance on low-skill workforce
- Reliance on migrant workforce
- Use of labour intermediaries
- Non-transparent sub-supply chain for H+H suppliers

Considering the said factors in combination with the policies described above in this Statement, we consider the risk of modern slavery in H+H UK Limited as very low.

H+H UK Limited only operates in the UK – a country with a strong governance, very low corruption level, strong enforcement of international human rights standards etc.

The production workers at H+H UK Limited are relatively high-skill, meaning they must be able to read and speak English to be able to cooperate with their colleagues in the production shift teams and to be able to understand manuals, instructions and our strict health & safety processes. Be trained in operating the automated machinery, participate in internal and external ongoing training to keep up or improve their qualifications etc. The said requirements make it close to impossible for migrant workers to work for us immediately upon arriving in the UK.



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The majority of staff working at H+H UK Limited are direct employees, with a small percentage of temporary staff employed through UK-based agencies via reputable agencies adhering to UK employment legislation. In our assessment, the direct employment clearly reduces the risk of modern slavery and human trafficking.

Also, the fact that H+H UK Limited's products and services are mainly sourced from suppliers within the UK, in our assessment clearly reduces the risk of modern slavery and human trafficking, since these are considered low-risk countries in that respect.

As appears from H+H's various policies listed above, H+H is committed to avoid modern slavery and human trafficking and has zero tolerance of that. The principle of sustainable sourcing is embedded into H+H's procurement work both via Group Procurement as well as procurement done locally by H+H UK Limited. As part of the processes surrounding the procurement of supplies to H+H and the framework of our business relations with each supplier, the H+H Code of Conduct for Suppliers with its supplier obligations, including the obligations in respect of preventing modern slavery and human trafficking, is clearly communicated to our suppliers.

As communicated to suppliers in the Code of Conduct for Suppliers, H+H will not accept that any supplier knowingly engage in or support activities constituting modern slavery or human trafficking, meaning the supply contract may be terminated. Also, if activities at the supplier or in the supplier's supply chain unknowingly to the supplier constitute modern slavery or human trafficking or if H+H perceives the risk of such activities taking place in relation to the supplier or its supply chain to be at an unacceptable level, the supplier shall accept to implement effective remedies, or H+H may terminate the supply contract.

Summary of progress in 2024

The annual progress on the prevention of modern slavery and human trafficking is measured based on the following key performance indicators (KPIs):

Monitoring labour date for risk indicators

We analyse workforce data to identify individuals who may statistically be at greater risk of modern slavery or human trafficking, such as non-UK nationals or others from vulnerable groups. In addition, Human Resources has implemented "Right to Work" checks as part of the onboarding process to verify appropriate documentation - such as identification, work permits, and other relevant records - where applicable.



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Press reports or rumours of breaches of the Modern Slavery Act 2025

If we become aware of such press report or rumours relating to suppliers, H+H, customers or other relations, we will investigate them, including confronting the respective supplier, customer etc., with the rumours.

Number of whistleblower reports submitted or cases detected on modern slavery or human trafficking:

In 2024, no whistleblower reports or detection concerning modern slavery or human trafficking were submitted to H+H UK Limited or directly to H+H Group/H+H International A/S and no cases of that nature were otherwise detected by H+H.

Level of training on modern slavery risks and mitigative actions

In 2024, the Human Rights Policy was issued and then distributed to all employees in the H+H Group via H+H's online policy management system as a mandatory read, with printed copies also available on-site.

Signed on behalf of the Board of Directors

Calm J Fasyth

Calum Forsyth

Managing Director

H+H UK Limited

July 2025

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For further information about the subject covered or any H+H product, please call or visit our website at www.hhcelcon.co.uk

