HUMAN RIGHTS POLICY STATEMENT

Policy Statement

Pickstock Telford Limited respects internationally recognised human rights and is committed to conducting business responsibly, lawfully and ethically. We support the principles of the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

We seek to avoid causing or contributing to adverse human rights impacts through our activities, to address impacts if they occur, and to prevent or mitigate impacts directly linked to our operations, products or services through our business relationships.

Purpose and Scope

This policy applies to all employees, workers, agency workers, contractors, directors and operations of Pickstock Telford Limited. We also expect suppliers, labour providers, recruiters and other business partners to respect internationally recognised human rights, comply with applicable law and meet the standards set out in this policy and the Pickstock Supplier Code of Conduct.

This policy should be read alongside Pickstock policies on modern slavery, ethical trading, equality and dignity at work, whistleblowing, recruitment, health and safety, grievance and data protection.

Our Commitments

Equality, dignity, and respect

We are committed to a workplace in which people are treated fairly, with dignity and respect, and without unlawful discrimination, harassment, bullying or victimisation. Employment decisions will be based on legitimate business requirements, capability, conduct and performance, and not on protected characteristics or other irrelevant considerations.

Modern Slavery and forced labour

Pickstock prohibits slavery, servitude, forced, bonded or compulsory labour and human trafficking in its operations and supply chain. Workers must not be required to pay recruitment fees or deposits, surrender passports or identity documents, or remain in employment through threats, debt, coercion or restriction of movement. Workers may leave employment in accordance with their contractual and legal obligations, and all wages properly due will be paid.

Child labour and young workers

Pickstock will not employ anyone below the applicable minimum legal working age and will not tolerate unlawful child labour within its supply chain. Lawful apprenticeships, work experience placements and employment of young workers may be supported where appropriate safeguards, risk assessments, working-time restrictions and supervision are in place.

Freedom of association and worker voice

We respect lawful rights to freedom of association, worker representation and collective consultation. Employees and workers may raise concerns, seek representation and participate in lawful consultation without

intimidation, retaliation or unfair treatment

Pay, working hours and benefits

We are committed to complying with applicable legislation and contractual obligations relating to pay, deductions, working time, rest periods, holiday entitlement, overtime and benefits. Working hours must be accurately recorded, and any overtime must be managed in accordance with legal and company requirements.

Safe, healthy and secure work

The health, safety and welfare of employees, workers and visitors are core business priorities. Pickstock will identify and control workplace risks, provide appropriate information, instruction, training, supervision and personal protective equipment, and consult employees on health and safety matters. Security arrangements will be proportionate and implemented with respect for privacy and dignity.

Responsible recruitment and labour provision

Recruitment must be fair, transparent and free from worker-paid recruitment fees. Pickstock will undertake proportionate checks on recruitment agencies and labour providers, including right-to-work processes, contractual standards, worker welfare, payment practices and indicators of labour exploitation. Any concern about coercion, accommodation, transport, debt or document retention must be escalated immediately to HR.

Human rights due diligence

Pickstock will take a risk-based approach to identifying, preventing, mitigating and monitoring human rights risks within its operations and value chain. Due diligence may include:

- reviewing workforce, recruitment, labour-provider and supply-chain risk indicators;
- assessing suppliers and labour providers before appointment and during the relationship;
- undertaking internal audits, ethical audits, site visits, worker interviews and document reviews where proportionate;
- considering risks associated with country, sector, commodity, temporary labour and vulnerable-worker status;
- requiring corrective action plans and monitoring completion; and
- reviewing concerns, incidents, audit outcomes and emerging legal or industry expectations.

Suppliers and business partners

Suppliers, contractors, labour providers and other business partners are expected to comply with applicable employment, health and safety, equality, modern slavery and human rights legislation. They must conduct their activities consistently with the Universal Declaration of Human Rights and the standards communicated by Pickstock.

Where concerns are identified, Pickstock will seek proportionate corrective action and improvement. Serious, repeated or unremedied breaches may lead to suspension or termination of the business relationship, subject to contractual rights and consideration of any unintended harm to affected workers.

Raising concerns and protection from retaliation

Anyone who becomes aware of an actual or suspected human rights concern should raise it promptly through one or more of the following routes:

- their line manager or another appropriate manager;
- the HR Department;
- the Company grievance or whistleblowing procedure;
- the OSI "Make It Right" reporting channel, where available; or
- emergency services or an appropriate external authority where there is an immediate risk of harm or a legal obligation to report.

Concerns raised honestly and in good faith will be taken seriously. Pickstock will not tolerate retaliation against anyone who raises a genuine concern, supports an investigation or refuses to participate in conduct reasonably believed to breach this policy. Deliberately false or malicious allegations may be addressed under the appropriate company procedure.

Investigation, remediation and escalation

Concerns will be assessed promptly and handled sensitively, objectively and, so far as possible, confidentially. Pickstock may investigate directly or use appropriate independent support. Where Pickstock has caused or contributed to an adverse human rights impact, it will provide or cooperate in fair and appropriate remediation. Where an impact is directly linked through a business relationship, Pickstock will use its influence to prevent or mitigate harm and promote access to remedy.

Remediation may include immediate safeguarding, repayment of improperly withheld sums or recruitment fees, correction of employment practices, support for affected individuals, supplier corrective actions, disciplinary action, notification to authorities and review of controls. The response will prioritise the safety and welfare of potentially affected people.

Training and awareness

Relevant employees, managers and operational teams will receive proportionate training and guidance to recognise and respond to human rights risks. Enhanced training may be provided to HR, Procurement, recruitment teams, labour users and managers responsible for worker welfare, supplier oversight or investigations.

Monitoring, governance and responsibilities

- Managing Director/General Manager: overall accountability and approval of this policy.
- HR Manager: policy ownership; employment-practice oversight; training; worker welfare; investigation and escalation of concerns.
- Procurement and relevant commercial functions: proportionate supplier due diligence, contractual expectations and corrective-action monitoring.
- Managers: implementation of this policy, fair treatment of workers and prompt escalation of concerns.
- Employees and workers: compliance with the policy and reporting of actual or suspected breaches.

Pickstock will monitor implementation through relevant management information, audit findings, reported concerns, investigations, workforce feedback, supplier reviews and corrective actions. Material issues will be escalated to the Managing Director.

Breaches of this policy

A breach by an employee may be addressed under the relevant company procedure and may result in

disciplinary action, up to and including dismissal. Breaches by agency workers, contractors, suppliers or business partners may result in corrective action, removal from site, suspension or termination of the relationship, subject to contractual and legal requirements.

Review and approval

This policy will normally be reviewed annually and sooner where there is a material change in legislation, business operations, identified risk, audit findings or recognised good practice. The policy does not form part of any employee's contract of employment and may be amended by the Company following any required consultation.

Signed on behalf of the Directors:



Name and Position: Nick Young, General Manager

Date: 27 July 2026