

RLC Group Modern Slavery Statement

FY2025

RLC Engineering Group Limited and its subsidiary companies (together being **RLC Group** and throughout this Statement **we** and **our**), recognise their responsibilities as an engineering group to ensure that slavery and human trafficking is not occurring in any part of our business or supply chain. Until such time as these risks have been eradicated globally, we are committed to working with our partners, suppliers and other interested parties to identify and mitigate modern slavery risks within our operations, business and our supply chain.

This Statement sets out the steps we have taken during the financial year ended 30 June 2025 (**FY25**) to ensure slavery and human trafficking is not taking place in our business or our supply chain. It is intended to provide an update on our progress in strengthening our modern slavery risk management framework and set out the steps we aim to take in the coming year.

Our Business

The RLC Group is a world class provider of components in the aerospace industry. Our products include engine components, complex aerofoils and fan blades, airframe components, actuation assemblies and components and sub-assemblies for ejection and crash worthy seats.

The RLC Group has facilities in the UK, Isle of Man and Singapore.

RLC Group has a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships.

Our Supply Chain

In FY25, we engaged approximately 1,200 suppliers, spending ~£130,000,000. Of those suppliers approximately 95% are based in the UK and North America, with a further 4% based in Europe. Our principal raw material suppliers are UK or US based, although we recognise that our suppliers' supplies may originate from other, overseas sources.

We oblige our suppliers, their employees and their supply chains to comply with all relevant laws and regulations. This requirement is set out in our Supplier Code of Conduct, which prohibits modern slavery and contains our expected standards of ethical behaviour and business conduct which is reinforced in our Standard Terms & Conditions of Purchase.

During FY25 we continued to strengthen our understanding of our supply chain. We have made good progress in relation to this exercise but recognise that we have more to do and we will continue our progress over the coming financial years. Building on our existing knowledge, *we are reviewing our supply chain practices and will be carrying out risk*

assessments of our suppliers to determine their risk category, utilising open source indices provided by credible organisations such as UNICEF and the International Labour Organisation.

We recognise elements of our supply chain are within industries that are considered higher risk. As we consider further due diligence activities, we will set priorities according to our assessment of risk.

During the next financial year, we plan to strengthen our supply chain team to enhance our capabilities and capacity. This additional resource will strengthen our approach to due diligence, risk assessment and risk mitigation of modern slavery related risks.

Our People

The RLC Group has over 1,000 employees. All employees are required to adhere to our Code of Conduct and Ethics and Business Conduct Policies. In addition, all employees are encouraged to report any concerns under our Speak Up Policy, and can do so anonymously, if preferred.

During FY25 we began enhanced employment due diligence checks aimed at increasing our ability to spot practices associated with modern slavery that could impact our employment and recruitment processes. We have further actions to take to fully roll these checks out across the RLC Group but are committed to doing this during the next financial year.

The RLC Group uses agency and contracted staff in our manufacturing operations in the UK. As we do not directly employ these persons, we consider there to be a risk that the source of these contracted or agency workers could be involved in modern slavery, or that these persons are paid less than the minimum statutory level. We use a limited number of reputable employment agencies in the UK and will be asking these agencies to sign up to our Supplier Code of Conduct in order to continue working with us. We view the risk in this area to be low.

Training

RLC Group employees are required to undertake awareness training in relation to our policies and procedures, including our Code of Conduct. As stated in our FY24 Modern Slavery Statement, we updated our training programme to include updated, modern slavery specific training. This training is mandatory for all employees and contractors who work at RLC Group and is undertaken as part of our onboarding processes and through annual refresher training.

Our Policies

Modern slavery is a crime and a violation of human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Our Vision and Values Statement, Code of Conduct and Ethics and Business Conduct Policy set out our core values of acting with integrity, respect, ownership, pride and passion. We have appropriate policies in place that underpin our commitments and values, including our Anti-Slavery & Human Trafficking Policy. These reflect our commitments to acting ethically and with integrity in all our business relationships and to implementing systems and controls to ensure modern slavery is not taking place in our operations or our supply chain.

Our zero tolerance approach to unethical conduct is supported by our Speak Up Policy, which encourages our stakeholders, both internal and external, to speak up and report any suspected wrongdoing or misconduct including an independent helpline, which supports anonymous reporting should that be preferred. Our policies and procedures encourage colleagues to contact their line managers, human resources or our executive team should they have any concerns.

We also provide an independent reporting system operated by Safecall. This allows concerns to be raised anonymously if preferred. This is available to internal and external stakeholders, such as suppliers. It is operated 24 hours a day, 7 days a week. All reports are investigated, and appropriate actions taken.

RLC Group policies are regularly reviewed and updated.

Risk Assessment

The RLC Group recognises that many people are vulnerable to modern slavery and unfair business practices in all sectors, including specialised and complex manufacturing. We have considered the risk of modern slavery taking place in our business and our supply chain.

The risk of modern slavery occurring within RLC Group's direct employee and contracted staff is considered to be low, taking into account: (i) the low prevalence of forced labour in the UK and Isle of Man; (ii) the roles being performed, and the skills and qualifications needed to perform those roles; (iii) the policies adopted by the RLC Group and the assurance processes we operate; (iv) RLC Group's access and security controls at its sites; and (v) the absence of reports of concerns or incidents of modern slavery.

We continue to enjoy the support of a long-standing, predominantly UK and US supply chain that we believe exhibits low risk of modern slavery and human trafficking. We

recognise that despite our supply chain being predominantly located in these low risk regions, our business includes areas considered to be of higher risk.

Key Performance Indicators

As part of our ongoing process of improvement and our review of our supply chain practices, we will develop and adopt key performance indicators to monitor the risk based assessments and actions we take to assess our modern slavery related mitigation measures in respect of our employees and use of contracted and agency staff and our supply chain practices.

Approval of Statement

RLC Group is committed to ensuring that modern slavery is not taking place in our business or supply chain and will continue to review and strengthen our existing safeguards.

This Statement has been made under section 54(1) of the Modern Slavery Act 2015 for FY25. It has been approved by the Board of Directors of RLC Engineering Group Limited and signed by a director.



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18th March 2026

Director, for and on behalf RLC Engineering Group Limited