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Modern Slavery Statement

For financial year ending December 2025

Introduction

CalaChem Limited and it's associated business units – Earls Gate Waste treatment, Earls Gate Utilities, Earls Gate Industrial Services, Earls Gate Developments - is completely opposed to all forms of slavery and human trafficking in every aspect of our operation and supply chain. We expect our employees, suppliers and contractors to display zero tolerance to exploitation and require they comply with the provisions of the Modern Slavery Act 2015 and hold their suppliers to the same high standards.

This statement outlines the steps taken by CalaChem Limited during the financial year 2025 to identify and prevent slavery and human trafficking in its business and supply chain.

Our business

From our site in Grangemouth, Scotland, CalaChem delivers key waste treatment and utilities services to our customers through our four separate business entities; **Earls Gate Waste Treatment Ltd.**, **Earls Gate Industrial Services**, **Earls Gate Utilities** and **Earls Gate Developments**.

Supply chain

We have a strict policy for the selection of suppliers and contractors for both direct and indirect goods and services.

Our key strategic suppliers have procedures in place to ensure modern slavery or trafficking is not taking place in their business or supply chain. We continually review our supply base of direct materials to ensure that our approved supplier lists are up to date and relevant, with any changes being captured in a formal management of change procedure.

Policies & procedures

CalaChem is committed to the highest forms of business conduct and ethics, is committed to compliance with all relevant legislation, and acts with integrity in all aspects of our business dealings. Many of our policies and procedures encompass aspects of our commitment to ensuring employees are treated in a fair and equal manner and explain how we comply with all laws on treatment of employees. The

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policies provide employees with the necessary information and support to best recognise exploitation and to ensure there is no slavery or human trafficking in our business or supply chain. The relevant policies include:

- Anti-corruption policy
- Recruitment and selection policy
- Equality policy
- Procedures for the appraisal and approval of vendors

We continually review and update our policies.

Due diligence processes

As part of its Vendor Review Process, CalaChem is asking all suppliers if they comply with the Modern Slavery Act 2015, and to provide evidence.

Once suppliers are selected, approved supplier lists are regularly reviewed and periodic audits are carried out to ensure continued compliance.

The suppliers in high risk industries or locations are scrutinised further, this includes periodic audits of tier one suppliers.

The number of suppliers that CalaChem uses has significantly decreased since it's decision to exit chemical contract manufacture in 2022, this helps CalaChem concentrate on measuring the effectiveness of its supply chain and approved partners.

Risk Assessment

As a UK based company with strict HR policies and procedures for recruitment of staff, we verify the identity of every employee. We also ensure that all candidates are legally entitled to be employed. All employees are required to provide original documentary evidence prior to employment.

Our main area of risk has been identified as being within our supply chain. CalaChem take a risk-based approach to supplier vetting and auditing. Our supply base has remained stable since last issuing this statement and the vast majority of the suppliers assessed are based in the UK.

CalaChem works closely with a number of partners, we expect our partners to comply with the Modern Slavery Act 2015 and take the appropriate steps to minimise the risk of slavery and human trafficking in their supply chain.

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Measuring effectiveness

CalaChem is committed to measuring the effectiveness of its policies and actions regarding Modern Slavery and have set forward the following KPIs to track and monitor our progress for the following year:

KPI	Reason for measure
Confirmed compliant supplier % within agreed review period	We will measure this at the end of the year to review how many of our live suppliers have confirmed their adherence to the Modern Slavery Act within our agreed review period of 3 years.
Annual review of the key strategic suppliers procedures	To ensure modern slavery or trafficking is not taking place in the key strategic suppliers' business or supply chain

Training

CalaChem is making sure it's employees are informed and will raise awareness on how to recognise and respond to any indicators of human rights abuse. We are committed to protecting employees and we ensure all disclosures are treated confidentially without fear of retaliation. Where required, we provide training to our staff with a particular focus on senior management, commercial, human resources and procurement.

We continually review and update our policies and commit to ensuring that we will incorporate recognition of modern slavery and human trafficking issues into our induction process for all new employees.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes CalaChem Limited's modern slavery and human trafficking statement for the financial year ending December 2025.

The board of directors have approved this statement.

Angus Gray, Director
Date: 6/1/26